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Evaluation of Gender Equality and Equal Opportunities within the European Social Fund

by Carol McNaughton Nicholls, Martin Mitchell, Ashley Brown, Nilufer Rahim, Emma Drever and Cheryl Lloyd

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Glossary of terms

Co-financing Organisation	European Social Fund (ESF) funds are distributed through public agencies. These agencies are known as Co-financing Organisations. CFOs bring together the ESF and match funding in a single funding stream. Most ESF is delivered via CFOs, e.g. Learning and Skills Council (LSC), LSC Regions, Department for Work and Pensions (DWP), National Offender Management Service (NOMS), the Regional Development Agency (RDA) and the London Development Agency (LDA). A small number of ESF projects are delivered directly by non-CFO organisations.
Co-financing Plan	Plan prepared either singly or jointly by several CFOs in a region to describe the activities, outputs and results that they will procure to help deliver priorities and so on.
Cross-cutting theme	Equal Opportunities and Gender Equality and sustainable development are the cross-cutting themes for the 2007-2013 ESF funding programme. The ESF Managing Authority has developed Mainstreaming Plans to promote the integration of these themes across the ESF programme
CFO Contract Manager	An individual with responsibility for managing the contract between provider organisations and CFOs.

Dual approach	The ESF Managing Authority Mainstreaming Plan promotes a dual approach to mainstreaming which encourages all provider organisations to take gender equality and equal opportunities into account when delivering their activities as well as using ESF funds to support a range of specific or specialist support activities. This approach is implemented through the inclusion of provider organisations delivering a mixture of mainstream and specialist (niche) provision.
ESF Division DWP (ESFD)	European Social Fund Division is based within the Department for Work and Pensions. The Division is responsible for overseeing the management of European Social Fund money in England at a national level. They are known as the Managing Authority.
	The Monitoring Committee at national level is chaired by the Managing Authority (ESFD) that has general oversight of the programme – sometimes referred to as the Programme Monitoring Committee (PMC)
	Regional Teams of the Managing Authority Government Office (GO) staff based in GO regions who deal with ESF at regional level. London is overseen by the LDA. Regional ESF Committees are sub-committees of the national PMC.
Equality Impact Assessment	An Equality Impact Assessment involves assessing the likely or actual effects of policies or services on different groups of people. It helps to ensure that the needs of people are taken into account when developing and implementing a new policy or service or when changes are made to an existing policy or service.
Gender Equality and Equal Opportunities sub committee	A sub-committee of the national PMC referred to above.

Mainstreaming	Gender equality and equal opportunities mainstreaming is a social justice-led approach to policy making in which equal opportunity principles, strategies, and practices are integrated into all aspects of the policy. In terms of ESF programme delivery, equal programme mainstreaming involves integrating equal opportunities into high level plans, delivery arrangements, including publicity and communications, as well as into monitoring and evaluation systems and strategies.
Mainstreaming Plan	The Managing Authority of ESF produced a Gender Equality and Equal Opportunities Mainstreaming Plan as part of their ESF Operational Programme. The purpose of the plan is to integrate Gender Equality and Equal Opportunities policy and practice across the ESF 2007-2013 Programme.
Operational provider project staff	Staff member involved in the delivery of CFO provider projects at a provider organisation.
Participant	An individual who has been a beneficiary of provision funded by ESF
Provider organisation	An organisation delivering provision (CFO Provider projects) that is funded by ESF in the form of a CFO provider organisation
Respondent	A generic term for those taking part in the evaluation.
Strategic provider project staff	Managerial staff involved in overseeing the delivery of CFO provider projects at a provider organisation.
Strategic stakeholder	A member of the Gender Equality and Equal Opportunities Sub Committee or individual with an integral role implementing the Mainstreaming Plan.

Summary

The European Social Fund (ESF) Gender Equality and Equal Opportunities Mainstreaming Plan for England and Gibraltar 2007-2013, outlined the vision for mainstreaming Gender Equality and Equal Opportunities across all levels of the ESF programme. NatCen was commissioned to evaluate the mainstreaming of Gender Equality and Equal Opportunities within ESF, in light of the Mainstreaming Plan.

Research aims

The aims of the evaluation of Gender Equality and Equal Opportunities within ESF were to:

• assess progress towards implementing the Gender Equality and Equal Opportunities Mainstreaming Plan at different levels of ESF operation;

• examine Gender Equality and Equal Opportunities policies and processes at different levels of ESF;

• identify and make recommendations on good practice to encourage Gender Equality and Equal Opportunities among ESF providers.

These considerations were made within the context of understanding barriers to accessibility experienced by different groups.

Methods

The evaluation was primarily qualitative and consisted of five stages:

• Stage one: literature review;

• Stage two: review of 34 Equal Opportunities policies drawn from across ESF provider organisations and regions;

• Stage three: in-depth interviews with 32 strategic staff members including Co-financing Organisations (CFOs), Contract Managers (CMs) representing different CFOs and regions;

- Stage four: Case Studies of 12 provider organisations, which consisted of 45 in-depth interviews with strategic and operational Provider project staff, participants, stakeholders and employers;

- Stage five: triangulation of the qualitative data with relevant Cohort Survey and Management Information (MI) data.

Gender Equality and Equal Opportunities policies and processes at different levels of ESF

Legislation and policies

- The Mainstreaming Plan operates within a context where the equalities agenda is highly salient and driven by a number of intersecting factors, including UK and EU equalities legislation.

- Gender Equality and Equal Opportunities legislation and Equal Opportunities policies are perceived by CFO CMs and Provider project staff to be valuable tools in the promotion of equalities. They place equalities high on the agenda of publicly-funded bodies and organisations, and set out standards, which should then be reflected in an organisation's practice.

- ESF stakeholders promoted equality in line with their public duties. However, the review of policies indicated variation in quality, and improvements could be encouraged.

Knowledge, training and understanding

- Whilst there is a commitment to the promotion of Gender Equality and Equal Opportunities at all levels within ESF, the extent to which this operates in practice varies according to the knowledge, skills and capacity of staff (at all levels) and views they hold about their role in relation to Gender Equality and Equal Opportunities.

- Targeting further training, based on existing knowledge of Gender Equality and Equal Opportunities and the role of the staff member, is recommended to ensure a consistent level of expertise.

Procurement, contract management and monitoring

- Good progress has been made to mainstream Gender Equality and Equal Opportunities in relation to procurement and monitoring. These are viewed as developed and successful processes of mainstreaming in operation. However there are also concerns that procurement and accreditation could be viewed as a 'paper exercise' by providers and there is a need to ensure that Gender Equality and Equal Opportunities practices outlined in the procurement process are translated into action.

- CFO CMs perceived their roles and responsibilities regarding Gender Equality and Equal Opportunities differently between different CFOs and different individuals. Clarifying roles and responsibilities is a priority area to address the varying levels of expertise and commitment currently in existence.

- The fact that diversity targets are viewed as aspirational and not linked to payments could limit the ability CMs have to prioritise them as project outcomes.

- Performance targets for Gender Equality and Equal Opportunities have focused on participants. There is less clarity about whether the promotion of Gender Equality and Equal Opportunities within ESF also applied to the employment practices of organisations receiving and procuring ESF funding and, if so, how this should be implemented. Despite the principle of balanced participation, ESF Division DWP (ESFD) may need to consider whether this area of mainstreaming should receive greater attention.

Encouraging Gender Equality and Equal Opportunities in the context of barriers to employment

- Findings from Provider project staff and participant interviews point to the proactive and sustained promotion of Gender Equality and Equal Opportunities as integral to ESF service provision. This is in terms of serving the general population of ESF participants in a manner that takes account of Gender Equality and Equal Opportunities, as well as providing niche services for specific groups facing particular disadvantages in the labour market – the dual approach. There are concerns from niche providers that this approach may be threatened by increasing prime contractors, however.

- Keys ways in which ESF-funded providers work to promote Gender Equality and Equal Opportunities is through the design and delivery of services that encompass:
  – active outreach to participant groups, and building links with community and voluntary sector organisations;
  – flexibility in terms of service design – providers make appropriate and timely changes in service offers, such as support around self-employment and flexible working options, in response to individual participant needs;
  – flexibility in the delivery of ESF-funded provision – in terms of the level of intensive support, flexibility in timings, location and structure of training being tailored to meet diverse participant needs and circumstances;
  – active employer engagement, in which providers build sustainable relationships with employers, facilitate the creation of work placement opportunities, challenge negative employer perceptions of different participant groups, or provide guidance and support around necessary adjustments.

- However, the extent to which providers are able to promote Gender Equality and Equal Opportunities varies, depending on the target group that providers aim to help, and the knowledge and understanding of staff regarding Gender Equality and Equal Opportunities. This returns to the need to clarify the roles of CMs to ensure consistency in the support and advice providers receive to promote mainstreaming of Gender Equality and Equal Opportunities via the contract management process. This is coupled with the need to ensure CMs are adequately supported to be able to undertake this.

Achieving and understanding equality targets

- Results from the MI data and Cohort Survey indicate progress is being made to meet the equality targets with regards to certain characteristics. For example, targets are being achieved in relation to disability in Priorities One and Four, and gender and ethnic minority targets are being achieved in Priority Five. Engaging participants over 50 is meeting the target if referring to the Cohort Survey data, and not MI data, but is close to being met.

- Rates for women are particularly low in Priority One in comparison to the targets set.

- Provider project staff report the gender target of 51 per cent women may be unrealistic, especially given the current economic situation, with traditional male industries being particularly affected.

- Good work is being done to engage ethnic minority groups, but more may need to be done to ensure ethnic minority groups are aware of ESF and what the provision can offer.

- It was found that some providers discussed *'working with whoever needs the service'*, especially if their overall performance is good. However outreach to particular groups may be necessary to ensure that ESF reaches those less engaged but that could benefit from the services. Promoting awareness to staff of why outreach and engagement is important, and not to meet targets, is recommended.

- Examples of successful targeting are provided in the report and include posters in different languages, drop-in sessions in community centres frequented by different groups, a presence at community events, and having staff involved in provider organisations with specialist knowledge of certain groups.

Progress implementing the Mainstreaming Plan

So far good progress has been made, however, mainstreaming can also be described as a work 'in progress':

- Mainstreaming is well advanced and this stems from the promotion of Gender Equality and Equal Opportunities already being embedded in the structure of the organisations involved in ESF. This includes the promotion of equality in line with public duties under the equalities legislation which is occurring via providers' and CFOs' policies and practice.

- CMs reported that achievements can be seen in terms of the plan offering a benchmark to aim for, and that the procurement and monitoring processes provide ways of ensuring that specific Gender Equality and Equal Opportunities policies and practices are put in place against which providers can be assessed. This embeds Gender Equality and Equal Opportunities within the planning, delivery and monitoring process.

- The procurement process and 'ways of working' providers adopt both act to support the dual approach successfully.

- The ECOTEC training and Gender Equality and Equal Opportunities being a cross-cutting theme of the programme both act to promote the visibility of Gender Equality and Equal Opportunities well.

- Progress is being made towards the equality targets and a number are being met.

However:

- there is variation in the extent to which Gender Equality and Equal Opportunities are integrated into delivering and planning at all levels, which stems from variation in the priority given to, and knowledge regarding, Gender Equality and Equal Opportunities;

- sharing of new ideas and good practice is still limited, and underpins variation in knowledge and understanding regarding Gender Equality and Equal Opportunities. Existing ESF resources such as websites, are under-utilised.

Therefore, substantial progress has been made, however work still needs to be done in order to make mainstreaming even more effective, including: clarification of what specific work should be undertaken by CMs and providers to promote Gender Equality and Equal Opportunities; the application of consistent measures of progress and good practice in relation the promotion of Gender Equality and Equal Opportunities (such as Equality Impact Assessments (EIAs)); and further dissemination of information relating to these measures.

1 Introduction

The current programme of the European Social Fund (ESF) runs from 2007 to 2013 and has a remit which covers England and Gibraltar. The programme supports EU, national and regional strategies to tackle weaknesses in the labour market. These include: low employment rates and high inactivity rates amongst disadvantaged groups; and poor basic skill levels and lack of level 2 qualifications.

The programme operates with two priorities in England (excluding Cornwall) which mirror Priorities Four and Five in Cornwall. In addition, Technical Assistance funds are provided to support the programme via Priority Three (England excluding Cornwall) and Six (in Cornwall):

• Priority One: **Extending employment opportunities** – supporting providers to tackle the barriers to work faced by unemployed and disadvantaged people.

• Priority Two: **Developing a skilled and adaptable workforce** – supporting providers to train people who do not have basic skills and qualifications needed in the workplace.

• Priority Four: **Tackling barriers to employment.**

• Priority Five: **Improving the skills of the local workforce.**

Particularly via Priorities One and Four, ESF supports providers to tackle barriers to work faced by disadvantaged groups, including people with disabilities, lone parents, older workers and people from ethnic minority groups. Thus, equal opportunities and preventing barriers to work based on discrimination and discriminative practices (such as a lack of childcare facilities) are key areas of work within ESF-funded provision.

The Department for Work and Pensions (DWP) has overall responsibility for ESF funds in England and manages this programme at a national level. Government Offices (GOs) manage the programme on behalf of DWP at a regional level, and ESF funds are distributed through Co-financing Organisations (CFOs). The Learning and Skills Council (LSC) and DWP are the main CFOs. A small number of other organisations are CFOs (such as Regional Development Agencies (RDAs) and local authorities). The CFOs manage the contracts of 'provider' organisations who deliver

ESF provision to 'participants' on the ground. Prime contractor organisations hold large contracts which include agreements with a number of subcontractors to provide niche and specialist services. Prime contractors are responsible for ensuring that subcontractors adhere to their contractual agreement and the principles of the ESF programme.

A full list of terms referring to the management of the programme is provided below (these are also outlined in the Glossary of terms):

Managing Authority – at national level this is ESF Division DWP (ESFD).

Monitoring Committee – the committee at national level, chaired by the Managing Authority (ESFD) that has general oversight of the programme – sometimes referred to as the Programme Monitoring Committee (PMC).

Gender Equality and Equal Opportunities Sub Committee – a sub-committee of the national PMC.

Regional Teams of the Managing Authority – these are GO staff based in GO regions who deal with ESF at regional level. London is overseen by the LDA.

Regional ESF Committee – A sub-committee of the national PMC, referred to above.

Co-financing Plan – Plan prepared either singly or jointly by several CFOs in a region to describe the activities, outputs and results that they will procure to help deliver priorities and so on.

CFOs – Co-Financing Organisations bring together the ESF and match funding in a single funding stream. Most ESF is delivered via CFOs such as Learning and Skills Council (LSC), LSC Regions, Department for Work and Pensions (DWP), NOMS, the Regional Development Agency (RDA) and the London Development Agency (LDA).

CFO Contract Managers – term for CMs who manage contracts between CFO and providers. CMs often work closely with contract monitoring officers (Relationship managers in LSC).

CFO Providers – Main delivery organisations contracted to CFOs to deliver ESF projects. CFO providers for DWP from large organisations are called Prime Contractors.

CFO Provider projects – activity or group of activities run by the provider to help deliver employment/skills in accordance with the programme.

Non-CFO organisations – a small number of ESF projects are delivered directly by non-CFO organisations.

1.1 Gender Equality and Equal Opportunities Mainstreaming Plan

The ESF Gender Equality and Equal Opportunities Mainstreaming Plan for England and Gibraltar 2007-2013, July 2008 (updated February 2009) outlined the vision for mainstreaming Gender Equality and Equal Opportunities across all levels of the ESF programme. The 2007-2013 Plan includes a coherent set of equality targets for the ESF programme (the first time these have been set) and identifies the need to develop the knowledge capacity of partners to assist with mainstreaming Gender Equality and Equal Opportunities at every level of ESF. The development of the Mainstreaming Plan (and promotion of Gender Equality and Equal Opportunities within ESF) has a long history, and the plan represents the accumulation of knowledge and understanding around the promotion of Gender Equality and Equal Opportunities from previous programmes. A chronological overview of Gender Equality and Equal Opportunities within ESF can be found in Appendix A. In the Mainstreaming Plan, gender is specified as an issue along with wider equal opportunities because:

• ESF is an EU-funded programme and the structural fund regulations give specific reference to the importance of promoting gender equality in all structural fund programmes;

• Women comprise 50 per cent of the population and are therefore a significant target group for programmes; and

• All public bodies have a public duty to promote gender equality (alongside their other equality duties).

The aim of the Mainstreaming Plan is therefore to ensure that:

• Gender Equality and Equal Opportunities are properly integrated into the planning, delivery, monitoring and evaluation of the ESF programme; and to support a dual approach to mainstreaming, i.e. one which encourages all providers to take gender equality and equal opportunities into account when delivering their activities as well as using ESF to support a range of specific or specialist support activities; and

• throughout the programme:

  – the equality targets set out in the Operational Programme at national and regional level are achieved;

  – a sustained and proactive approach to promoting Gender Equality and Equal Opportunities is maintained and the theme is highly 'visible' throughout the programme;

  – all stakeholders involved in the programme are encouraged to consider how they might improve upon the way they integrate equal opportunities by sharing and disseminating new ideas and good practice as well as reward those partners through a national award scheme; and

  – it is ensured that all partners involved in delivering ESF actively promote equality in line with their public duties under equalities legislation.

The Mainstreaming Plan also proposes that CFO plans, procurement and contract management processes are subject to Equality Impact Assessments (EIAs). EIAs provide a framework for considering potential risks to different groups and also provide the opportunity to consider how policies and practice can further develop equality.

1.2 Management of Gender Equality and Equal Opportunities within ESF

The DWP has a unique role in relation to the management of the ESF 2007-2013 programme as both the overall Managing Authority for the programme in the UK and as one CFO that manages ESF providers on a regional basis. DWP and the LSC act as the CFOs for the majority of providers funded under the programme, with a small proportion being managed by regional bodies such as RDAs or local authorities.

As overall responsibility for managing ESF funds lies with the DWP, the links between the Mainstreaming Plan and other existing DWP equality schemes are important at strategic and operational levels. The DWP published its first disability, gender and race equality schemes in December 2006. Since then it has also made clear its commitment to the promotion of Gender Equality and Equal Opportunities through its arrangements for procurement and contract management. Equality requirements are an integral part of the processes for procuring provision, provider accreditation, contract management and quality assessment. Provider guidance informs providers of DWP's requirements (see Appendix C). Commitment to Gender Equality and Equal Opportunities are also spelt out in the DWP's *Introduction to Sustainable Procurement*, paragraphs Equal Opportunities13 – Equal Opportunities18 (see Appendix D), which sets out the policies and processes required of the DWP and its providers to meet legal requirements relating to Gender Equality and Equal Opportunities and to promote equality.

The LSC also has a Single Equality Scheme that covers all its funded provision, including that funded through ESF. It incorporates individual schemes for gender, disability and ethnicity into a coherent framework for promoting equality and diversity. At the time of conducting the research, the LSC was the functioning CFO. From 1 April 2010, the LSC's CFO responsibilities transferred to the Skills Funding Agency. For 14-19 ESF provision the Skills Funding Agency works in partnership with the Young People's Learning Agency and local authorities.

Other CFOs also have their own equality schemes. Although their ESF delivery may not be specified in their equality schemes, the mainstreaming approach proposed in the ESF Plan seeks to ensure that the ESF-funded element of their delivery is focused on helping to discharge the public duty to actively promote equality. This duty extends to both providers contracted via the CFO and subcontractors to the provider.

At a strategic level key partners involved in implementing the Gender Equality and Equal Opportunities Mainstreaming Plan within ESF include:

- Managing Authority: who actively promotes equal opportunities by developing the operational policy for mainstreaming equal opportunities, including integrating it into plans, delivery arrangements and monitoring systems as well as setting up an equal opportunities network and integrating the theme into communications and the national website;

- Programme Monitoring Committee (PMC): who ensure that a high level of commitment and visibility is given to promoting the equality theme;

- Gender Equality and Equal Opportunities Sub Committee: who have an important role in advising the Managing Authority on the preparation and delivery of the Mainstreaming Plan;

- Regional Skills Partnerships (RSPs): The RSPs (and the London Skills and Employment Board in London) establish the regional ESF framework documents for their region which informs the CFO's plans. These CFO plans inform the tender specifications for the procurement of provider services, setting out the regional priorities for funding and support;

- Regional ESF committees: Regional ESF committees have a role to play in terms of endorsing the regional CFO plans, ensuring that equality issues identified in regional ESF frameworks are addressed and also in considering CFO regional performance reports, including progress towards equality targets as well as agreeing action to remedy under-performance.

On the ground key partners involved in implementing the mainstreaming of Gender Equality and Equal Opportunities within ESF are:

- CFOs: CFOs' duties should include an assurance that equal opportunities are integrated into provider procurement arrangements and that they set contractual obligations concerning equal opportunities in terms of policies, implementation plans and adhering to legislation via the process of contract management undertaken by CFO Contract Managers (CMs). They also actively promote equal opportunities as well as ensuring that contractual requirements are met through monitoring visits and contract management practices.

- Providers/local delivery: ESF providers should actively promote equal opportunities through the design and delivery of provision through, for example, conducting EIAs. They are also obliged to adhere to the contractual requirements of ESF funding. Prime contractor providers are responsible for managing subcontractors that may provide specialist provision for niche groups. Schedule 8 of DWP ESF contracts sets out specific responsibilities on equality and diversity for providers. They are also described in the DWP accreditation, procurement and contract management processes (see Appendix C, points 7-14).

In August 2009 NatCen was commissioned to evaluate the mainstreaming of Gender Equality and Equal Opportunities within ESF, in light of the Mainstreaming Plan.

1.3   Research aims

The aims of the evaluation of Gender Equality and Equal Opportunities within ESF were to:

- assess progress towards implementing the Gender Equality and Equal Opportunities Mainstreaming Plan at different levels of ESF operation;

- examine Gender Equality and Equal Opportunities policies and processes at different level of ESF (with a focus on procurement, targets, accessibility and training);

- identify and make recommendations on good practice to encourage Gender Equality and Equal Opportunities among ESF providers.

This was in the context of barriers to accessibility experienced by different groups

1.4   Methodology

The evaluation adopted a primarily qualitative methodology. Qualitative research is designed to provide an in-depth understanding of the views and experiences of research respondents. This approach is particularly suited to facilitating exploration of less tangible phenomena such as 'equal opportunities' or emerging concepts such as mainstreaming and in gaining an understanding of the programmes and mechanisms through which outcomes are achieved, for example, the drivers of mainstreaming. Findings from the qualitative research have, where relevant, been triangulated with the quantitative dataset from the ESF Cohort Survey and Management Information (MI) data. This provides a comprehensive overview of progress towards mainstreaming and the experiences of different groups within ESF.

The qualitative findings reflect the range and diversity of perceptions on progress towards mainstreaming that are present at strategic, CM and provider level within the ESF programme. However, as is the case with qualitative research, the number of respondents expressing particular views or who reported particular experiences are not reported, as this has no statistical significance and numeric conclusions about the wider population cannot be drawn.

The methodology for the evaluation consisted of five distinct strands – literature review, review of policies, in-depth interviews with strategic stakeholders and CMs, in-depth interviews with Provider project staff, participants and stakeholders, and triangulation with quantitative Cohort Survey and MI data. Each methodological strand is explored in detail below.

1.4.1   Literature review

A literature review of the existing evidence regarding Gender Equality and Equal Opportunities in employment was completed. The review had a particular focus on the barriers to work experienced by 'equality' groups and on best practice for overcoming barriers. The review also set the context to the Mainstreaming

Plan by providing an overview of the history of equal opportunities and diversity management and the development of equalities legislation. The literature review was peer reviewed by an academic expert working within the field of equalities and employment (Gill Kirton, QMUL). The full review can be found in Appendix B.

1.4.2 Review of ESF providers' Equal Opportunity policies

It is a requirement that all organisations delivering ESF provision have an adequate Equal Opportunities policy. Equal Opportunities policies are monitored by CFOs through the accreditation process with organisations bidding to become contractors are required to undergo. In order to ascertain the scope, range and content of these policies across the ESF 2007-2013 programme, written policy documents that referred to equal opportunities were reviewed as part of the evaluation.

Sample

The sample was drawn from across each of the nine English regions. A further distinction was made to include Cornwall (Convergence Objectives) and the two transitional fund sub-regions separately, taking the regions, as referred to in the evaluation, to 12.

Purposive sampling (Richie and Lewis, 2003) was used to draw up a sample of 72 (six per region, of the 12 regional categorisations, excluding Gibraltar, included in the evaluation as outlined above) ESF providers from which to request Equal Opportunities policies. The aim of purposive sampling is to achieve diversity of coverage across key variables rather than to obtain a statistically representative sample. With respect to the policy review, the key variables were geographical region, Priority, CFO, and whether the organisation was a prime or subcontractor. These variables were selected in order to enable the research team to map the scope of Equal Opportunities policies across providers delivering the ESF 2007-2013 programme. The sampling strategy was also then used to provide the sample from which to draw the subsequent regional Case Studies.

The sample was contacted by a member of the research team and a copy of their Equal Opportunities policy requested. The recruitment of Equal Opportunities policies however, proved challenging. The reasons for this were twofold: firstly, the data in the sampling frame regarding contact details was unavailable; and secondly, there was a lack of engagement in the research from some providers. Great effort was made by the research team to overcome these challenges. This included drawing upon secondary sources to locate contact details, and multiple attempts to contact providers in order to obtain their Equal Opportunities policies.

Despite the challenges encountered, the research team successfully contacted 65 providers and from this obtained 34 Equal Opportunities policies. The research team are confident that those who engaged in the research displayed a sufficient range of diversity across key sampling criteria (region, priority, CFO) to allow for meaningful analysis of the data. This included 16 policies from DWP, 16 from LSC

and two from other CFO providers.

Data Management and Analysis

The Equal Opportunities policies were analysed with the aid of FrameWork (see section below on the analysis of interview data for details of this process). A set of criteria for the assessment of the Equal Opportunities policies was developed by drawing upon resources produced and provided by ECOTEC. ECOTEC is a research and consultancy organisation commissioned to deliver training on the mainstreaming of equalities to strategic and operational staff across the ESF programme. The ECOTEC training material outlined the key components of good quality Equal Opportunities policies. These criteria were adopted to review the policies for the evaluation to ensure continuity across the implementation of mainstreaming Gender Equality and Equal Opportunities within ESF. In order to ensure that the policy review was informed by current best practice the criteria were then further developed following familiarisation with the data set. The details of these criteria are outlined in Chapter 2.

Equal Opportunities policies were given an overall rating depending upon the extent to which the content of the policy met the indicators of good practice under each theme. Policies which were rated highly performed strongly across each of the five themes and those that were given a lower rating did not perform so well against the five themes (i.e. there was no or cursory reference to the theme within the policy). In addition, the review of policies also monitored the equalities groups which were specifically mentioned within the policy. The findings from the policy analysis are presented in Chapter 2.

1.4.3   In-depth interviews with strategic stakeholders and CMs

A key component of the evaluation was in-depth interviews with strategic stakeholders and CMs working within ESF and different CFOs. The purpose of these interviews was to explore perceptions and views of Gender Equality and Equal Opportunities at the strategic and contract management level within the ESF 2007-2013 programme. Specifically, interviews were conducted with members of the Gender Equality and Equal Opportunities Sub Committee and Managing Authority, senior ESF CFO CMs from DWP and LSC, regional CMs from DWP and LSC, CMs from a number of other CFOs, and ESF representatives from GOs.

The interviews lasted approximately one hour and were carried out using a topic guide, which can be found in Appendix E. The purpose of the topic guide was to help focus and shape the discussion, while allowing each individual to generate and discuss relevant issues as they arose in an open way. The main topics which were explored during the interviews were:

• awareness of the Mainstreaming Plan;

• exploration of current practice regarding Gender Equality and Equal Opportunities with particular focus on exploring drivers to mainstreaming such as procurement practices, adherence to legislation and targets and training; and

- identifying potential good practice regarding the promotion of Gender Equality and Equal Opportunities within the ESF programme.

Sample

Purposive sampling was used in order to generate the sample. As outlined earlier in the chapter, purposive sampling aims to capture as wide a range of perceptions and experiences as possible, rather than to be statistically representative. As such, key criteria are chosen that relate to the research objectives and respondents are then invited to participate in order to represent a 'type' in relation to key criteria, and to ensure that the range of possible diversity has been covered within the research.

The selection of the sample took place in two stages: Firstly, a sample of key stakeholders was identified with the assistance of the ESF Evaluation Team. The sample was drawn to ensure that the views of key strategic staff with responsibility for the development, implementation and monitoring of the Mainstreaming Plan were included within the research. This included members of the Gender Equality and Equal Opportunities Sub Committee drawn from the managing bodies of ESF outlined above. Thus the primary sampling criterion was strategic responsibility for the Mainstreaming Plan. At the time of being invited to participate in the research, these strategic staff were also asked to provide the contact details of CFO CMs. A second sample was then drawn up to ensure that the CFO CMs who took part were diverse with respect to the CFO they represent, their role within the ESF programme and their geographical remit. ESF Gender Equality and Equal Opportunities stakeholders in the sample are distinct as they were members of the Sub Committee or had an integral role in the implementation of the Mainstreaming Plan such as designing the training provided but were not members of staff representing ESF or an ESF CFO. The distinction is made throughout the report of findings from CMs and those members of the Gender Equality and Equal Opportunities Sub Committee or Gender Equality and Equal Opportunities stakeholders. For full details of the terminology of roles and responsibilities within ESF see the Glossary of terms and terminology at the beginning of this chapter.

Given the number of stakeholders involved in the evaluation it may be useful to provide clarity at this point regarding how each will be referred to throughout the report. Strategic stakeholder refers to members of the Gender Equality and Equal Opportunities Sub Committee or an individual with an integral role implementing the Mainstreaming Plan. CMs are CFO CMs (no non-CFO CMs were interviewed). Staff from provider organisations who managed and worked within CFO Provider Projects are referred to generically as Provider project staff, however, given that both strategic and operational staff were interviewed this may be specified, when relevant, using the terms 'strategic Provider project staff' or 'operational Provider project staff'.

Participant refers to an individual who has received ESF help (for example, attended a course) whereas respondent is the generic term used to describe those taking part in the evaluation.

In total, four ESF Gender Equality and Equal Opportunities strategic stakeholders and 28 representatives from CFOs (including CFO CMs) took part in in-depth interviews, either individually or paired, depending on the availability of relevant staff (23 data collection encounters took place). Table 1.1 illustrates the sample, across CFOs:

Table 1.1   Strategic stakeholders and CFO Contract Managers Interview sample

CFO/organisation	Number interviewed
ESF Gender Equality and Equal Opportunities Stakeholders	3
ESFD	1
DWP	8
LSC	8
Regional	10
GO	2

Themes from these interviews are reported in Chapter 3.

1.4.4   Regional Case Studies

A key component of the evaluation methodology was the development of regional Case Studies with provider organisations. The data for these Case Studies was gathered via in-depth interviews with strategic staff (managers) and operational staff (front line workers) at provider organisations, and in a smaller sub-section of Case Studies, with participants and external stakeholders such as employers. Where the finding from the Case Studies refer to the views of both strategic and operational staff they are referred to generically as 'Provider project staff'.

Each interview lasted approximately one hour and they were conducted in a private space such as a meeting room at the respondent's place of work. The interviews were carried out using a topic guide, which can be found in Appendix E. The purpose of the topic guide was to focus and shape the discussion, while allowing each individual to generate and discuss relevant issues as they arose in an open way. The topics covered were designed to develop understanding of how Gender Equality and Equal Opportunities practices are implemented, and to gather information from a range of stakeholders regarding their experience of Gender Equality and Equal Opportunities. Barriers to course accessibility and employment experienced by participants due to characteristics such as age and gender were also explored, and ways in which good Gender Equality and Equal Opportunities practice could operate to overcome these barriers, in light of the equality targets set, were discussed.

Sample

Purposive selection was used to generate the Case Study sample. The primary sampling criterion was geographical location and in order to ensure diversity one

provider was selected from each of the 12 regions. Diversity was also achieved across CFO, by focus of service (i.e. mainstream or niche) and Priority – although the onus was on Priority One due to the explicit focus within this Priority on overcoming barriers to employment. A more detailed explanation of the rationale of purposive sampling can be found earlier in the chapter.

In each of the 12 ESF regions one provider or subcontractor organisation was identified (from the policy documents reviewed and original sample matrix) and approached as a potential Case Study. Relevant strategic and operational staff were then identified and asked to take part.

Thirty-three interviews took place with strategic and operational Provider project staff. In addition, in-depth interviews also took place with participants who had attended courses, employers or staff from partner organisations in six of the 12 sites. These six were designed as in-depth cases.

A summary of the sample is provided in Table 1.2.

Table 1.2   Case Study sample

	CFO/Priority	Staff		Stakeholder		CFO CM interviewed
		Strategic	Operational	Participant	Other	
Area 1	LSC 1	1	1	2	-	Yes
Area 2	LSC 1	1	2	-	-	-
Area 3	Regional 1	1	2	-	-	-
Area 4	DWP 1	1	2	2	-	-
Area 5	Convergence LSC 4/5	3	1	2	-	Yes
Area 6	LSC 1	1	2	2	-	-
Area 7	DWP 1	1	1	-	-	-
Area 8	DWP 1	1	4 (group)	-	-	Yes
Area 9	Regional 1	1	-	1	1	Yes
Area 10	LSC 1	2	1	-	1	-
Area 11	DWP Match	1	1	-	-	-
Area 12	Regional 2	2	-	-	1	Yes
		16	17	9	3	5
Total		33		12		5

There was some overlap between CMs involved both as strategic respondents and also being the CM of Case Study providers. Where this occurred it has been indicated in Table 1.2.

A total of 77 ESF stakeholders were interviewed for the qualitative research component of the evaluation. It is important to reiterate that qualitative research strives for diversity, saturation and in-depth exploration rather than numerical quotas, and these numbers have been reported for information only. Further caveats to this are reported in the section below on limitations.

Data Management and Analysis

The data from this study were analysed with the aid of FrameWork (Ritchie *et al.*, 2003), a systematic approach to qualitative data management that was developed by NatCen and is now widely used in social policy research (Ritchie *et al.*, 2003). Framework involves a number of stages: First, the key topics and issues which emerge from the research objectives and the data are identified through familiarisation with the transcripts. The initial analytical framework is then drawn up and a series of thematic charts or matrices are set up, each relating to a different thematic issue. The columns in each matrix represent the key sub-themes or topics whilst the rows represent individual respondents. Data from verbatim transcripts of each interview are summarised into the appropriate cell. In this way, the data are ordered in a systematic way that is grounded in respondents' own accounts, yet oriented to the research objectives.

This approach is supported by a bespoke software package, FrameWork, also developed by NatCen. The software enables a flexible approach to the creation of the matrices, allowing new columns or 'themes' to be added during the process of data management. This software also enables the summarised data to be hyperlinked to the verbatim text in the transcript so that it is possible to move back and forth from the abstracted summary to the original data, depending on the level of analysis and detail required. Finally, the cases and themes that are displayed can be chosen with complete flexibility, easily allowing cases to be ordered, compared and contrasted. The Framework approach and the FrameWork software mean that each part of every transcript that is relevant to a particular theme is noted, ordered and instantly accessible.

1.4.5 Quantitative analysis of MI and Cohort Survey data

The ESF Cohort Survey (2008-2010) is a survey of participants of providers funded by the ESF. The study covers England and aims to provide evidence on the longer-term outcomes of the support provided by the 2007-2013 ESF programme. The Cohort Survey is also used to measure a number of indicators and targets that cannot be captured through participant monitoring information. ESFD also collate MI throughout the programme, and the most recent MI data (to September 2009) has been provided to the evaluation team.

MI data and information from the ESF Cohort Survey have been used in the evaluation to analyse key trends relating to groups of interest, e.g. women, older people, ethnic minority groups, and people with a long-term limiting illness (LTLI) or disability. Specifically, this explores:

• the representation of different groups within ESF provision;

• whether groups are experiencing ESF provision in different ways.

Results from the quantitative data analysis have been triangulated with the qualitative findings to add further nuances, to infer explanations as to why some groups experience the provision differently.

1.4.6 Research ethics and anonymity

Ethical conduct and adherence to Data Protection protocols and legislation take the utmost priority within social research. The design for the evaluation (including the consent process) was subject to scrutiny from the NatCen Research Ethics Committee, and adheres to Social Research Association (SRA) guidelines. Membership of the Committee consists of senior NatCen staff and research and policy experts from external agencies. Prior to Research Ethic Committee approval for a study being granted, a detailed application is made to the Committee outlining key areas of the proposed research and how these impact upon ethical practice. This process is then reviewed via a formal panel appraisal and further advice provided before ethical approval is granted and the research commences.

To promote the confidence that research respondents had in disclosing accurate views and information regarding the mainstreaming of Gender Equality and Equal Opportunities within ESF, and their working practice in relation to Gender Equality and Equal Opportunities, anonymity was assured. To promote this, respondents are referred to by labels referring to their CFO and the role they have within the CFO, or the type of provider organisation they were recruited via and their role in relation to the provider organisation. Regions and provider organisation names are not identified.

1.4.7 Limitations

As was noted previously, qualitative research is concerned with exploring topics in-depth and the meaning attached to certain issues, rather than prevalence or numerical findings. Given the number of respondents and the diversity that had to be accounted for within the sample, it is not possible to make inferences in the evaluation regarding variation by region, CFO type or priority. That is to say that, whilst the overall qualitative findings are generalisable in that they cover the range and diversity of possible experience that could be found, it is not possible to state that discernible differences relate to specific characteristics of the respondent, such as the region, or provider types (prime/subcontractor for example) they belong to. The exception to this is where it has been relevant to identify differences between CFO or provider type due to the different operational structure this imposes on their work, which may in turn have affected their perception of and engagement with Gender Equality and Equal Opportunities within ESF. Another exception is that of the Cohort Survey data reported, which have been tested for statistical significance.

Cohort Survey and MI data provide a valuable overview of ESF provision and the experiences of participants. The Cohort Survey data has been further interrogated within the evaluation and triangulated with the qualitative data regarding barriers to accessibility and experiences of participants explored in the Case Studies.

However, Chapters 2 and 3 report on qualitative data that has no comparable quantitative data set, exploring the views of respondents and the review of policies; thus, quantitative data is only triangulated where relevant (predominantly in Chapter 4).

1.5   Report structure

Mainstreaming Gender Equality and Equal Opportunities within ESF does not occur within a vacuum, but is happening alongside a range of additional drivers that may facilitate, complement or be integral to the process. Thus, the value and impact that key drivers such as legislation and quality of Equal Opportunities policies have on mainstreaming are explored in the next chapter. The review of Equal Opportunities policies is presented and good practice regarding the development and promotion of Gender Equality and Equal Opportunities legislation and policies identified.

In Chapter 3, strategic stakeholders, CMs and providers' awareness of the Mainstreaming Plan and the significance of Gender Equality and Equal Opportunities as a cross-cutting theme of the programme, are discussed. Key processes that underpin mainstreaming Gender Equality and Equal Opportunities are explored, including procurement, training, monitoring and targets and information sources.

In Chapter 4 the experiences of participants by equality characteristics – age, gender, ethnicity and disability – are outlined in turn. Cohort Survey data is presented that illustrates key similarities and differences between groups in terms of how they access and engage with ESF provision and the outcome of this engagement. Providers' and participants' views on the barriers to accessibility that may be experienced on the basis of characteristics, and means to overcome these, are then discussed and their experiences triangulated with the Cohort Survey data to explore the trends identified further.

In the final chapter progress that has been made mainstreaming Gender Equality and Equal Opportunities within ESF provision for the 2007-2013 programme is considered.

2   Contextualising the Mainstreaming Plan – Gender Equality and Equal Opportunities legislation and policies

The Mainstreaming Plan operates within a political, legal and social context within which the equalities agenda is salient. This agenda is driven by a multitude of intersecting factors. Both internal and external drivers may facilitate the promotion of equalities across the 2007-2013 European Social Fund (ESF) programme. It is important to identify and explore drivers of Gender Equality and Equal Opportunities that exist independently of the ESF programme and a significant external driver of Gender Equality and Equal Opportunities is legislation relating to equality, fair treatment and discrimination. Organisations and individuals should uphold their statutory duty to the existing legislation, regardless of their relationship to the ESF Programme. In this chapter the views of strategic stakeholders, Co-financing Organisation CFO Contract Managers (CMs) and Provider project staff, on the visibility of equalities legislation and its implications for day-to-day practice are explored.

A principal manner in which organisations evidence their commitment to enact their legislative duties with respect to Gender Equality and Equal Opportunities is through their equal opportunity policies. A review of Equal Opportunities policies across a sample of ESF provider organisations is therefore also included within this chapter. This is coupled with the views of CMs, Provider project staff and participants on the visibility and value of these policies. This chapter sets the context for then exploring the processes of Gender Equality and Equal Opportunities that are integral to the ESF programme such as procurement, monitoring and training.

2.1 The legislative context of the Mainstreaming Plan

An outline of the legislative framework pertaining to equalities in the UK is provided in the literature review in Appendix B. In this section the views of strategic stakeholders, CMs and Provider project staff (and where relevant participants) regarding their awareness of legislation and policies, and the value of these drivers of equality, are outlined.

2.1.1 Awareness of equalities legislation

EU and UK equalities legislation was reported by respondents as having a positive impact on mainstreaming equalities. This was because it placed the promotion of Gender Equality and Equal Opportunities high on the agenda of publicly-funded bodies and services, including provider organisations, and, through the procurement and contracting process, providers of publicly-funded services have to acknowledge their duties in relation to the legislation and demonstrate that they have policies and strategies in place that allow them to meet these duties.

Strategic stakeholders and CMs reported that they had a good level of knowledge of existing equalities legislation. This knowledge was attributed to their current work; membership of Gender Equality and Equal Opportunities committees; training received; access to intranet depositories and/or through their personal interest in the equalities agenda. If strategic and CM respondents were not aware of the 'intricacies' of the legislation they noted that they had access to organisational resources where they could gain the requisite information, such as an intranet. However, despite these positive findings some CMs found it difficult to articulate what the legislation, and with it equalities, really meant or the implications this had for their work. They could be reluctant to pursue this area because it was not regarded as a central aspect of their role. This indicates that knowledge and understanding regarding Gender Equality and Equal Opportunities is in some cases high but also inconsistent, a key finding that emerged throughout the evaluation. This finding on variance also resonates with findings from other research (e.g. Greene and Kirton, 2009 in the literature review).

Provider project staff also reported that they were less aware of the detail of legislation, particularly when they worked at subcontractor or operational level. Those who thought existing legislation had a significant impact on how they carried out their duties emphasised the way in which the law informed their way of working to encourage participation in training and employment with participants. Provider project staff also regarded the risks associated with non-compliance as high, such as losing contracts and facing legal action. Therefore, legislation created both a stick to drive Gender Equality and Equal Opportunities forward, and also acted to promote good practice via the duties it invoked.

2.1.2   Equality Act 2010

A similar uneven pattern of knowledge applied for CMs in relation to the implications of the forthcoming Equality Act 2010. Respondents were able to discuss a variety of ways in which the Act might impact on their own organisation or on the provider organisations they worked with. These involved a proactive duty to promote Gender Equality and Equal Opportunities – across the equality stands covered under the Act – rather than simply protecting staff and participants from discrimination; a duty to consult different groups of participants on their needs; active inclusion of the promotion of Gender Equality and Equal Opportunities in their organisation's procurement processes; potentially greater use of Equality Impact Assessments (EIAs); and the requirement to monitor across all six (or seven if trans people are included separately) equality strands. However, CMs also reported that they were not aware of any likely implications of the Equality Act 2010, indicating variance regarding awareness of Gender Equality and Equal Opportunities once more, although further dissemination of information regarding the possible impact of the Act may rectify this in the future.

In terms of their own practices, CMs who had considered the implications of the Equality Act 2010 on their work, observed that they were on the 'front foot' emphasising that they felt they were already doing what was necessary to adhere to the legislative duties as they related to their own role. Measures included commissioning training or developing new roles within their organisation to build capacity regarding implementation of equality duties. Variance in awareness of the Equality Act 2010 could be a concern, however, and may indicate that clear guidelines and information regarding this should be written and disseminated to CM staff in the future.

Overall, Provider project staff were not particularly familiar with the possible implications of the Equality Act 2010, with operational staff particularly, having minimal awareness. This is perhaps not surprising and it was reported by some Provider project staff that responsibility for Gender Equality and Equal Opportunities policy, and how this is expected to shape practice, was deemed to sit at a strategic level within their organisation. It was assumed that this would be disseminated when relevant to their work. Possible implications of the Act were raised however, for example, by a strategic Provider project staff member of a prime contractor provider organisation who had thought about the implications arising from the duty to consult different groups about their needs, and their responsibility to ensure subcontractors enacted this duty.

In order that equalities legislation can support mainstreaming it is essential that there is a sound understanding of legislation by strategic stakeholders, CMs and strategic Provider project staff. It is then the role of these staff members to transmit tailored and relevant information regarding the implications of legislation upon practice, across their organisations. Whilst it was reported that strategic stakeholders and some CMs had a good level of knowledge of legislation, in order to enhance and maintain knowledge, and ensure it is effectively transmitted across the ESF programme, additional emphasis may need to be placed upon

facilitators of learning, such as training, access to information depositories and ensuring that equalities is an aspect of the day-to-day role of CMs and Provider project staff. This would be particularly useful given that the legal environment is likely to become even more complex with the anticipated advent of the Equality Act 2010 and the new duties it will place upon public bodies.

Overall, (and unsurprisingly given the nature of the organisations involved in ESF) compliance with equalities legislation was reported to be integral to the operations of CFOs and providers and their staff – indicating that one of the aims of the Mainstreaming Plan is being met. However, the variance in knowledge and understanding regarding legislation (amongst CMs and Provider project staff), and the implications this may have, indicated inconsistency in the level of expertise and awareness that exists. This may in turn limit the ability that all stakeholders have on their ability to ensure that duties are indeed being met at an operational level, rather than just relying on the guidance of senior or specialist staff to manage this process.

2.2   Equal Opportunity policies of ESF providers

As outlined in Section 2.1, one of the principal ways in which an organisation evidences its commitment and intent to comply with equalities legislation and to enact its statutory duty as an employer, service provider or public body, is through its Equal Opportunities policy. It is also a requirement that all organisations delivering ESF provision have an adequate Equal Opportunities policy.

As is discussed in Chapter 3, Equal Opportunities policies are assessed during the accreditation process for ESF provider organisations. It is also the responsibility of prime contractors to ensure that the Equal Opportunities policies of subcontracted delivery partners are to an adequate standard.

To determine the scope, range and content of ESF provider organisations' equality policies a review was carried out of a sample of policies. The results of this review are outlined in Section 2.2.1.

2.2.1   Equal Opportunities policy review

The process for selecting the sample and analysing the policies is outlined in Section 1.4. The Equal Opportunities policies received were assessed against five key themes. The criteria for the assessment are outlined below:

Policy Assessment Criteria
Mainstreaming

• Awareness of and commitment to Mainstreaming and/or related concepts.

• Specific mention of ESF priorities or themes.

Policy statement and legislation

- Policy statement recognising the importance of equalities and commitment to continuous improvement.

- Reference to relevant EU/UK equalities legislation, intent to comply and reference to duty to promote and consult on equalities.

- Measures to avoid unfair dismissal and existence of grievance procedures.

Commitment and reviewing

- Commitment from high level staff and key roles and responsibilities defined.

- Indication of when document was issued and by whom and commitment to regular reviewing.

Measures to promote equalities

- Measurable objectives and inclusion of objectives in appraisal process.

- Provision of equalities related training.

- EIAs.

Monitoring and performance management

- Mention of specific equalities targets.

- Commitment to monitoring key objectives and mention of monitoring/ performance management systems.

- Commitment to reporting equalities.

- Outline of procedure for addressing equalities issues identified through monitoring/reporting.

2.2.2 Findings from the review of Equal Opportunities policies

The Equal Opportunities policies could be rated on a continuum, ranging from high scoring to average/low. At each end of the continuum the policies came from provider organisations varying in scope and scale, thus large national provider organisations were found to have policies which were high scoring as well as average, and the same is true of smaller, regional provider organisations (which may have been subcontractors). Interestingly, this indicated that the size of an organisation and therefore the resources they have regarding staff does not necessarily correlate with a high quality Gender Equality and Equal Opportunities policy. This is an important finding because it could be claimed that 'good practice' often requires expertise, which could be resource intensive, whereas, such a level of staff resourcing does not seem to guarantee high quality Gender Equality and Equal Opportunities work. This finding raises a question for further research – what are the key facilitators and barriers to organisations developing high quality Equal Opportunities policies?

Similarly, variation was found in the quality of policies of niche and mainstream provider organisations and across the policies of voluntary and third sector provider organisations and private contractor providers. An exception however, was statutory provider organisations (colleges and local authorities) which were found to have policies which generally rated very highly against each theme. This is perhaps unsurprising given the key roles these organisations perform as public institutions, but a point of good practice could be for organisations such as these to provide their policies to subcontractors as practical examples of what can be included in Equal Opportunities policies. It is also of note that the documents reviewed included equal opportunity, diversity management and policies combining elements of both approaches. This shows that there is not a common language in use regarding these concepts and also may have indicated different policy orientations, as well as different substantive policy priorities (see the literature review in Appendix B for further discussion of these approaches).

The following sections outline the findings regarding each of the criteria used in the review.

2.2.3 Mainstreaming

The content of the policies varied in the extent to which commitment to the principles of mainstreaming were demonstrated. Policies that evidenced commitment to mainstreaming included the explicit use of the term, as the following example illustrates:

> *'The* [organisation name] *is committed to mainstreaming the Equality and Diversity agenda across all services.'*

In addition, commitment was also demonstrated through the adoption of language such as: 'embedding' equal opportunities, making equalities 'integral' or 'equality proofing' every aspect of the organisation's work. The content of these policies also included specific strategies, tools and techniques for the implementation of mainstreaming. These included:

• legislation;

• EIA;

• equality frameworks (equality standard); and

• monitoring and reporting.

A commitment to integrating equal opportunities within all aspects of an organisation's work was borne out across the content of the policy: organisations which were rated highly in this respect were judged to have highly rated policies overall. Policies which scored highly were comprehensive in their scope with the equality policy covering all aspects of an organisation's work and extending to employees, service users and where relevant, subcontractors. Thus, embracing the language of mainstreaming was associated with a high level of commitment to Gender Equality and Equal Opportunities.

2.2.4   Policy statement and legislation

In all of the policies the general duty to comply with the wider equalities legislative framework was outlined, however policies which were very comprehensive also expressed a commitment to uphold specific equalities legislation, regulations and codes of practice, which were named and described.

Examples of good practice also included outlining key principles – such as direct/indirect discrimination, victimisation and harassment – underpinning legislation. In order to illuminate the requirements imposed by the legislation, practical examples were provided.

These practical examples provided clear signposting and guidance for readers on the implications and limitations of what should be done to promote equalities.

The quality of a policy was also evidenced through acknowledging the duty imposed on public bodies to promote race, disability and gender equality; reference to the new duties which will come into force as a result of the Equality Act 2010 was regarded as best practice in the review.

2.2.5   Commitment and reviewing

It is important to ensure that there is a stated high level commitment to equal opportunities within an organisation and that the roles and responsibilities regarding who is responsible for the implementation of a policy are clearly stated.

The content of the policies reviewed specified equalities roles and responsibilities to varying degrees. This included comprehensively outlining the specific responsibilities of senior and strategic staff for the promotion, implementation, monitoring and reporting of equalities, and the existence of an Equalities Committee charged with overseeing the implementation of specific responsibilities. There were however, policies that made reference to staff members having more specific duties, but without outlining what these were. There were also policies in which the staff responsible for equalities were not identified or mentioned. Therefore, it is recommended that policies do contain information regarding the roles and responsibility of named staff regarding Gender Equality and Equal Opportunities.

Legislation and thinking around good equalities practice is not static, but dynamic and is an ongoing process of development. Therefore, it is important that mechanisms are in place to update and review Equal Opportunities policies.

An example of good practice included outlining the regularity of review, who will undertake the review and the criteria by which the policy will be assessed, as the example below illustrates:

> *'The policy is designed to encourage practical changes. It is expected that it will be updated in light of experience, changes in legislation and best practice. This will take place on an annual basis. The Head of HR will assume responsibility for reviewing the elements relating to employment and the Director of Services for the elements relating to services. The Diversity Steering Group will take responsibility for ensuring that* [Organisation name] *considers changes in best practice and experience.'*

Good practice included the explicit identification of who had issued the document, when it had been issued and a timetable for review. This could be contained in a sentence on the first page of the document and is not a complex or costly process. The omission of this within some of the policies reviewed raised concerns regarding how current and relevant the policies actually were and it is recommended that the content of policies should specify the regularity and mechanism by which it will be updated as well as the date of the last update.

2.2.6 Measures to promote equality

In highly rated policies there were also practical examples given of measures to promote equality within the organisation. Examples of these are provided below.

Training

Highly rated policies evidenced commitment to the promotion of equalities through providing training for staff members. This included one-off training as part of the induction process as well as continuous professional development. An example of best practice was a policy that included a two-day training course covering the equality strands, relevant legislation and public duties. The training was compulsory for all staff members and was tailored to their roles and responsibility within the organisation.

EIAs

Policies which expressed an explicit commitment to conducting EIAs belonged to local authorities and further education colleges. This may be understood in light of the equalities duties imposed upon public sector organisations. Commitment to undertaking EIAs was however, not limited to these bodies and was also found in policies belonging to voluntary sector organisations. Examples of good practice included a comprehensive overview of the aims, value and benefits of EIAs, as well as the process for carrying them out. Another example of good practice was the inclusion of toolkits to support the effective undertaking of EIAs for internal use within the organisation.

Measures to avoid unfair treatment

Good practice in relation to avoiding unlawful discrimination included formal codes of practice covering both staffing and service delivery and less formal measures such as outlining the practical steps which can be taken to avoid unfair treatment and facilitate access to services. For niche providers this could focus specifically upon their target group. An example of this included a provider organisation outlining measures to promote accessibility for people with sight impairments. In recognition of the cross-cutting nature of barriers there was a commitment to ensuring that services were also accessible to speakers of English as a second language:

'Heads of Services and Regional Managers will ensure....[t]hat information about our services is available in accessible formats. This includes Braille, tape, large print and in other languages which reflect the ethnic makeup of the location in which the service operates.'

This example of text from a policy also illustrates how roles and responsibilities can be easily outlined.

Partnership working

Measures which were outlined within policies as means to promote equality included a commitment to working with a diverse range of delivery partners and/ or ensuring that delivery partners are committed to equalities. This could have been achieved through incorporating equalities within the tendering process and reviewing subcontractors' Equal Opportunities policy on a regular basis. In other cases the mechanisms for ensuring quality amongst delivery partners was not outlined.

2.2.7   Monitoring and performance management

Not all of the policies included the identification of equality targets. Good practice was encapsulated in policies outlining specific and measurable targets in relation to the four equality strands covered in legislation at the time of the review, and an explicit awareness of the need for targets and commitment to developing targets in the future. Policies which listed targets in relation to both staff and service users, and how to measure, monitor and assess these targets were regarded as best practice.

Commitment to monitoring and reporting equal opportunities varied. Differences included:

• expressing a commitment to monitoring but not outlining targets or the monitoring processes;

• expressing a commitment to monitoring the demographics of service users/staff but no specific targets for these groups.

Good practice in relation to monitoring and reporting included identifying where monitoring data was currently insufficient, establishing strategies to improve upon this, and setting out what will happen to monitoring data after it has been collected, as the following example provides:

'… assessment reports will be made available. The Diversity Director will ensure that results are published in a manner that is appropriate, accessible to all those likely to be affected by those results and in accessible formats. In most cases the reports will be summarised. In addition to making clear any changes to a policy following consultation and assessment, the published summary will include information about consultations undertaken; why a consultation took place, how it was carried out, a summary of the views expressed and an assessment of the options considered.'

2.2.8   Scope

Within the content of the policies, reference was made to each of the groups covered across the six key equality strands due to be covered by the new Equality Act 2010: age, gender, ethnicity, religion and belief, disability and sexual orientation (or seven if trans people are included separately). Policies at the higher end of the spectrum extended scope beyond these groups to prohibit discrimination and unfair treatment on the basis of any unjustifiable criteria. These related to a person's social class, health, relationship status, caring responsibilities, lifestyle, citizenship and the terms of their employment. This was in contrast to policies that listed a cursory inclusion of different characteristics, and failed to outline a commitment to reduce discrimination on the basis of their characteristics.

Enhancing the quality of Equal Opportunities policies

As discussed in Section 2.1, it was reported by CMs and Provider project staff that legislation can have a positive impact upon mainstreaming Gender Equality and Equal Opportunities through establishing a high level commitment to equalities within organisations delivering public services. One of the principal ways in which this commitment is evidenced and, it is hoped, transmitted into practice can be via Equal Opportunities policies.

The quality of a provider organisation's policy is therefore of importance and is monitored as part of the procurement process for ESF funds. To assist in the promotion of good practice regarding Equal Opportunities policies the following measures have been identified on the basis of the policy review. These suggestions have also taken into account the varying resource levels available to organisations delivering ESF provision and awareness that the time and expertise available may be limited. For organisations with fewer resources or whose Gender Equality and Equal Opportunities policy and practices are less developed, some measures may be longer-term aspirations and additional support, for example, establishing targets and monitoring processes, may be required. However, as was noted earlier, it does not always equate that larger, well resourced organisations will have higher quality Equal Opportunities policies, and small organisations could demonstrate high quality in this area. Therefore, level of resources or size of organisation does not appear to be a valid excuse for poorer quality Equal Opportunities policies.

It is worth noting that at the time of the research, the Gender Equality and Equal Opportunities policy toolkit (developed by ECOTEC) which outlines guidance and good practice for developing a high quality policy would not have been distributed to all provider organisations and their subcontractors. To assist in the promotion of high quality Equal Opportunities policies, CMs may wish to ensure that the comprehensive guidance developed by ECOTEC is provided to provider organisations. This could be complemented by lighter touch guidance outlined below.

The quality of an Equal Opportunities policy may be enhanced by:

• clearly outlining when the policy was last reviewed, who conducted the review and dates for future renewal;

• clearly outlining which individuals or groups within the organisation are responsible for implementing, monitoring and reviewing the policy;

• expressing a commitment to comply with specific relevant equalities legislation;

• expressing a commitment to include equalities within training for all members of staff. This could be tailored to their role and proportionate to organisational resources;

• developing procedures to identify appropriate equalities targets for staff and service users and systems for monitoring this

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Summary – Review of Equal Opportunities policies

• The policy review found that Equal Opportunities policies ranged in quality from those which performed very well against the indicators under each theme to those which performed less well across all themes.

• There was not a clear sign that certain types of provider organisations performed better than others across the board, with both small and large/ prime and subcontractors having higher and lower rated policies. Local authorities and colleges consistently displayed high quality and extensive policies.

• It is difficult to determine progress towards the mainstreaming of equalities on the basis of policy taken in isolation from practice. However, it is evident from the review that there were organisations which displayed a high level of commitment to equalities and which sought continuous improvement through the development of measurable objectives and effective systems for monitoring and reporting on equalities within their policies. There were also organisations (large and small) with sparse and poorly defined policies.

• In addition to promoting the development of high quality Equal Opportunities policies through procurement, organisations could also be supported to develop high quality policies through dissemination of best practice and provide examples of good quality policies.

2.3 Implementation of Equal Opportunity policies

As highlighted in Section 2.2, whilst the review provides an overview of the scope, range and content of Equal Opportunities policies it is not possible to determine, on the basis of the review, the extent to which an Equal Opportunities policy may act as a driver of equality through its impact upon the day-to-day practice of a provider organisation. In order to explore Equal Opportunities policies as drivers

of equality the views of Provider project staff and participants on the visibility and value of policies within their organisation was explored and the findings from this are outlined in the following sections. Ascertaining perceptions on the role and value of policies within provider organisations, coupled with perceptions of the value of legislation, allowed an understanding of the mechanisms through which policies may affect organisational culture and practice in relation to Gender Equality and Equal Opportunities mainstreaming. It also provided an indication of Provider project staff's level of commitment to and knowledge of Gender Equality and Equal Opportunities. This is significant as a high level commitment to equalities within all aspects of the ESF programme is an integral objective of the Mainstreaming Plan.

2.3.1 Awareness of Equal Opportunities policies within organisations

CMs indicated that they had a working knowledge of their organisation's Equal Opportunities policy for example, by discussing recent amendments to the document. However, there were also staff who had limited awareness.

Provider project staff who indicated that they had a good level of awareness of their organisation's policy, tended to have specific responsibilities in relation to Equal Opportunities and Gender Equality; had previously undertaken a role in which Equal Opportunities and Gender Equality were prominent; or expressed a personal interest in equalities. Reasons given for Provider project staff having low levels of awareness of Equal Opportunities and Gender Equality were that they did not have specific responsibilities in relation to equalities and other staff members were perceived to have the requisite equalities knowledge – it was not *'their area'*. So there was variation, with staff having different levels of awareness and commitment to the equalities agenda. It is perhaps unsurprising that staff for whom equalities is not viewed as an explicit aspect of their role would perceive this to be outside of their remit. However, a lack of commitment or knowledge could lead to staff being unable to understand where their duties lay regarding the promotion of Gender Equality and Equal Opportunities and with it the risk that Gender Equality and Equal Opportunities remained marginalised. To mitigate the perception that Gender Equality and Equal Opportunities is not a responsibility of all Provider project staff, it is important that both general and specific responsibilities with respect to Gender Equality and Equal Opportunities are clearly outlined in provider organisation's Equal Opportunities policy and that these are also communicated to staff through other mechanisms, such as staff training.

The promotion of Gender Equality and Equal Opportunities was also very important to participants accessing ESF provision. Participants discussed their provider's commitment to Gender Equality and Equal Opportunities through the visibility of their Gender Equality and Equal Opportunities policy. For example, participants had been given an outline of the organisation's Gender Equality and Equal Opportunities policy at first contact with the provision. This had signified to

the participant a commitment on behalf of the provider organisation to equalities, which they found positive. This again highlights the importance of having a clear and comprehensive policy, because the policy can then be used to disseminate the commitment to equalities held by an organisation, thereby improving its reputation among participants.

2.3.1 Enhancing awareness of Equal Opportunities policies and Equal Opportunities and Gender Equality legislation

The following could be inferred to be valuable tools and techniques for raising awareness of Gender Equality and Equal Opportunities policies and legislation within organisations where awareness was lower:

• ensuring that the Equal Opportunities and Gender Equality policy and legislation is included within the induction process for new staff members and for participants accessing the provision;

• making policies easily accessible to all staff members for example, staff having access to up-to-date electronic versions of policies or hard copies of policies being stored at a publicised location, for example the intranet;

• clearly communicating forthcoming changes to equalities legislation and its implications for practice;

• awareness of and access to sources of information on equalities such as internet depositaries; and

• displaying a poster which clearly outlines who is responsible for overseeing the Equal Opportunities and Gender Equality policy within the organisation and to whom staff members can direct questions.

2.3.2 Perceptions of Equal Opportunities and Gender Equality policies

Equal Opportunities policies were perceived by Provider project staff to be valuable tools for ensuring that equalities is promoted at a strategic level within organisations and in setting out best practice in ways of working:

> *'It's there to prick their conscience…because…if you don't have that policy at all, then they…can…basically do exactly as they please….'*

(Operational staff, Provider)

There was concern however, that the value of an Equal Opportunities policy was limited if an organisation paid lip service to their policy and failed to reflect the principles and measures outlined within the policy in the design and delivery of services. This concern was also raised by strategic stakeholders and CMs. Implicit within this critique is the view that Equal Opportunities policies can be a mechanism through which to transmit equalities legislation and best practice into the design and delivery of services. In particular, it was felt that whilst it is important that organisations evidence commitment to meeting the needs of different groups,

they should also be realistic and open about the extent to which they are able to do so by ensuring that the aims and objectives of Equal Opportunities policies are framed in grounded, realistic (rather than aspirational) language. There is also a need to acknowledge that the needs of different strands/groups can appear to conflict and that good quality Equal Opportunities policy and practice is not necessarily easy.

2.3.3   Enhancing the quality and value of Equal Opportunities policies

Whilst CMs and Provider project staff did not indicate that they perceived their organisation's Equal Opportunities policy to be less than adequate, some CM and Provider project staff identified ways in which the quality of their policy could be enhanced. This included developing the policy to reflect the duties anticipated to arise from the Equality Act 2010 and ensuring that Equal Opportunities policies across the ESF programme complemented one another.

There was also discussion regarding the extent to which policies are implemented:

> *'Some* [providers] *will take it seriously, some will play at it, others will pay lip service...but they'll have a policy because they have to have a policy…what they do about applying the policy is where you get the variables.'*

> (CFO CM, DWP)

Thus, a view held by respondents was that encouraging implementation was of utmost importance. Provider project staff suggested that the procurement process could be modified so as to add increased emphasis upon assessing not only an organisation's policy, but also evidence of its implementation. A tangible way in which it was suggested that organisations could evidence progress towards the implementation of Equal Opportunities and Gender Equality was through outlining specific examples of good practice undertaken in the day-to-day promotion of equalities. In addition, organisations could evidence strategic commitment to equalities through developing implementation plans which work in parallel with the policy.

This chapter has explored two of the major drivers of equalities which are independent of the ESF programme, and which may be facilitating Gender Equality and Equal Opportunities mainstreaming: equalities legislation and Equal Opportunities policies. In doing so it has mapped the range and content of Equal Opportunities policies amongst a sample of ESF provider organisations. In addition, it has also explored perceptions of the impact of legislation and Equal Opportunities policies upon practice and levels of awareness amongst CMs and Provider project staff. Having explored these drivers of mainstreaming, processes of mainstreaming which are integral to the ESF programme are discussed in Chapter 3, with a particular focus upon procurement, contract management, monitoring, and training.

2.4 Chapter summary

• **Equalities legislation**: The Mainstreaming Plan operates within a context where the equalities agenda is salient and is being driven by a number of intersecting factors, the most significant of which the UK and EU equalities legislative framework.

• **Gender Equality and Equal Opportunities policies**: One of the principal ways in which an organisation evidences its commitment to uphold its legislative duties with respect to equalities is through their Gender Equality and Equal Opportunities policy. A review of Gender Equality and Equal Opportunities policies amongst a sample of provider organisations found that there was considerable variation in the quality of Gender Equality and Equal Opportunities policies. However, it is not possible on the basis of the review to determine the extent to which the quality of a policy correlates with the practice of an organisation.

• **Impact of legislation and policy upon promotion of equalities**: Gender Equality and Equal Opportunities legislation and Equal Opportunities policies were perceived to be valuable tools in the promotion of equalities through placing equalities high on the agenda of publicly-funded bodies and organisations, and in setting out good practice in ways of working which should then be reflected in an organisation's practice. The role of legislation and policy in the promotion of equalities was however, perceived to be diminished by lack of awareness amongst staff and subcontractors and lack of implementation.

3 Gender Equality and Equal Opportunities processes within ESF

Key processes integral to the mainstreaming of Gender Equality and Equal Opportunities within the European Social Fund (ESF) include procurement, training, contract management and monitoring and evaluation. In this chapter these are explored. Views from strategic stakeholder and CFO Contract Manager (CM) respondents and Provider project staff respondents are included throughout, with differences between strategic stakeholders, CMs, providers and subcontractors noted, where relevant.

3.1 Awareness of the Mainstreaming Plan

The content, purpose and implementation of the Mainstreaming Plan are outlined in Chapter 1. In this section levels of awareness of the Mainstreaming Plan are discussed.

3.1.1 Strategic, regional and CFO level

There was variation in awareness of the Mainstreaming Plan. A high level of awareness of the mainstreaming of Gender Equality and Equal Opportunities at strategic stakeholder and CM level was related to the following key factors:

• involvement in the development of the plan or the training associated with its implementation;

• accessing the training on the mainstreaming of Gender Equality and Equal Opportunities commissioned by ESFD and provided by ECOTEC;

• the extent of the promotion of Gender Equality and Equal Opportunities within participants' day-to-day work.

Conversely, a lower level of awareness tended to be reported by respondents who:

• lacked experience or training in Gender Equality and Equal Opportunities policies and practice; this could lead to a feeling that the subject was too vast to take on board;

• felt overburdened with policy initiatives and workload, and not able to give sufficient time to fully understand Gender Equality and Equal Opportunities within their work.

A key finding from CMs was that some felt they lacked experience or knowledge of Gender Equality and Equal Opportunities policies and practices. This was not the case with all CMs, however when it was felt to be the case, this could result in inertia in terms of feeling able to actively promote Gender Equality and Equal Opportunities. This was compounded further if there were reported to be staffing difficulties within particular regions, which resulted in CMs feeling that they had a high number of contracts to manage and that they could not give Gender Equality and Equal Opportunities the dedicated attention it deserved in the context of the needs of general management.

In addition to these issues there was a sense from CMs that providers were the 'experts' on Gender Equality and Equal Opportunities, because their day-to-day work involved working with disadvantaged groups. Whilst well-meaning, this may have reflected a lack of understanding of the need to embed Gender Equality and Equal Opportunities practices into each level of ESF and not just the 'front-line'. Therefore, more may need to be done to ensure that all stakeholders take an active role in the promotion of Gender Equality and Equal Opportunities, as specified in the Mainstreaming Plan.

Strategic stakeholders' and CMs' understanding of the purpose of the Mainstreaming Plan, or Gender Equality and Equal Opportunities as a cross-cutting theme, related to their level of awareness of Gender Equality and Equal Opportunities as concepts. Unsurprisingly, strategic stakeholders tended to have a high level of awareness, whilst it was found to be varied between a relatively good sense of familiarisation and very little awareness, amongst CM respondents. Notably, both people who had attended the ECOTEC training and those who had not, emphasised that the purpose of the plan could still be more clearly defined and articulated. This was especially so in terms of which CFO and provider activities mainstreaming principles applied to. For example, the question was raised, do the principles apply only to the processes of procurement and provider service delivery, or also to the staffing policies and practices of providers? It was also felt that, to date, Gender Equality and Equal Opportunities as a cross-cutting theme had not been promoted as extensively as the other theme of Sustainability (although it should be acknowledged that training and information regarding Gender Equality and Equal Opportunities was implemented later than Sustainability, and may not have achieved similar levels of dissemination at the time of the fieldwork).

Nevertheless, despite this variance, it was generally reported that Gender Equality and Equal Opportunities have a high priority (indicated by the status of being a cross-cutting theme and the Mainstreaming Plan) within ESF, and that there are myriad structures in place to ensure legislative duties to promote the equalities agenda in the UK are being met:

> *'If you look at the organisations who are delivering the programme, and predominantly that is DWP and the LSC, equal opportunities or gender equality and the mainstreaming of it is something that's embedded in their very core. Now the specifics of how that is applied to ESF, that's an added layer.'*

(Co-financing Organisation (CFO) CM/strategic staff, other CFO)

3.1.2   Providers' awareness of the Mainstreaming Plan

Arguably, there was less of an expectation that providers and their staff be aware of the Mainstreaming Plan, although Provider project staff may have awareness of Gender Equality and Equal Opportunities as a cross-cutting theme. As expected, strategic and operational Provider project staff had rarely heard of the Mainstreaming Plan, although they were able to guess the meaning of mainstreaming from encountering this or similar concepts – such as 'embedding' – in their wider experience of Gender Equality and Equal Opportunities policies and practices.

Awareness of Gender Equality and Equal Opportunities as cross-cutting themes was evident among Provider project staff, although awareness varied from an accurate understanding of the concept; having heard of it, but not understanding what it meant; to not having heard of Gender Equality and Equal Opportunities as a cross-cutting theme at all.

A number of tensions arose, however, in terms of understanding the concept of mainstreaming Gender Equality and Equal Opportunities: Firstly, some Provider project staff were unclear whether Gender Equality and Equal Opportunities should apply to the provider's workforce as well as to service delivery. They felt that greater clarity was needed in this regard. Secondly, there was confusion among some operational Provider project staff about the precise meaning of Gender Equality and Equal Opportunities, in particular in terms of whether it meant taking account of the different needs of different groups and/or treating everyone the same.

Provider project staff therefore suggested that there could be improved awareness and clarification of the meaning of mainstreaming. In particular, there was a need to clarify which areas of policy and practice the mainstreaming of Gender Equality and Equal Opportunities applied to (viz. provider's workforce and service delivery) and how they should be applied in general terms (e.g. accounting for different needs and/or treating everyone the same).

3.1.3 ECOTEC training and toolkit

Gender Equality and Equal Opportunities training on mainstreaming for CMs was provided by ECOTEC earlier in the programme. The training was developed following a needs analysis and then piloted before being 'rolled out'

The training provided an introduction to Gender Equality and Equal Opportunities legislation and its context; recent legislative developments such as the Equality Act 2010; how to assess provider performance in relation to the promotion of Gender Equality and Equal Opportunities; reasons for underperformance; examples of best practice in relation to different social groups; and quotas and targets within ESF in the context of mainstreaming. A significant part of the training was also given over to how providers' policies could be assessed and the use of a toolkit for assessing Gender Equality and Equal Opportunities.

Key strategic stakeholders involved in the development of the training reported that it was designed to help CM staff to:

• move beyond compliance with equality legislation, and take a more proactive role in assessing the policies and practices of providers;

• consider how Gender Equality and Equal Opportunities could be mainstreamed within their roles and responsibilities;

• help advise organisations on how to chart progress and identify areas of improvement in relation to the promotion of Gender Equality and Equal Opportunities;

• improve the confidence of CMs to hold conversations with providers about their performance in relation to Gender Equality and Equal Opportunities targets.

Given the significant role that the ECOTEC training and toolkit has for driving the cascading of the skills and knowledge required to mainstream Gender Equality and Equal Opportunities within the ESF programme, discussion of the training was given particular attention during the evaluation.

Not all CMs interviewed had attended the training or intended to do so. Reasons given for non-attendance included: they did not have time; they had received information about the training too late to book; the training took place before they joined the organisation; or a strategic decision was taken about who should attend within their organisation with the view that some staff could cascade learning gained to others.

Those who had attended the training praised it for being informative and well presented. It had improved their understanding of mainstreaming in broad conceptual terms. However, there could be confusion over the exact meaning of Gender Equality and Equal Opportunities mainstreaming and the exact CM responsibilities it applied to in practice. So there was generally positive feedback, however the following issues were also raised:

Applicability of the toolkit to their organisation/role – There were concerns that the toolkit may be 'generic' and not address different roles and responsibilities within organisations such as the DWP and LSC (e.g. the separation of accreditation, contract management and performance review). For example, while other CFOs would be involved in all stages of the assessment of Gender Equality and Equal Opportunities policy and practice, these tasks were divided between different members of staff within larger CFOs. Related to this was also the view that CFOs such as the DWP already had toolkits for assessing performance of Gender Equality and Equal Opportunities for non-ESF-funded provision which were appropriate to their organisation and the type of providers they worked with. The introduction of another toolkit, therefore, could serve to add a layer to this. DWP staff also reported being unsure of the implications the training had for their role. Policies are currently assessed via Momenta (an independent organisation commissioned to conduct the accreditation process) and staff were unclear if they would now be expected to take on this role following the training. The position on this could be communicated to staff in the future to resolve this confusion.

Respondents from other CFOs and local authorities also noted that the toolkit was fairly complex. They thought that the template was 'very detailed' and could be 'impractical' and 'burdensome' for smaller organisations with limited resources to complete it. As one respondent put it, the toolkit could be seen as a *large stick for a small butterfly'*, suggesting that it could be a laborious exercise in practice. The respondent added:

> *'Well it was, if you think of the size of the projects that we're delivering, one of our delivery organisations has only got three staff. And this was something like a 22-page tool to do something that they're already doing, they're already doing the monitoring; they're already doing the recording. They're already being assessed in several ways. And to ask them to then complete this online tool, which was very detailed and very much geared up to national organisations with 7,000 staff, there wasn't a concept of scale there, which I found difficult.'*

> (CFO CM, other CFO)

Instead, it was suggested that the toolkit would be useful if it was 'proportionate' to the size and resources of the organisation, for example, by identifying a smaller number of key measures of the quality of Gender Equality and Equal Opportunities policy that could be assessed, but that would be likely to have a maximum impact on provider practice and outcomes.

Advancing knowledge about Gender Equality and Equal Opportunities and how to assess performance on these issues – Among CMs, there was considerable variation in knowledge about how to promote and monitor performance in relation to Gender Equality and Equal Opportunities. Staff with little or no awareness of Gender Equality and Equal Opportunities, but who saw this as part of their role, found the training very useful, describing it as 'interesting' and 'engaging'. Aspects found to be particularly useful were the way in which the

training:

- broadened their knowledge of Gender Equality and Equal Opportunities legislation, policies and practices;

- emphasised the importance of Gender Equality and Equal Opportunities in the way they performed their work activities (e.g. procurement, contract management); and

- provided a helpful introduction to the toolkit and how this could be used to assess the performance of providers in terms of specific policies and practices.

> *'The toolkit is extremely good because it is almost an idiot's guide of saying, you know, if you're looking for high level commitment, for instance – which I think is one of the first pillars, here's the kind of thing that you should be able to see when you go to a provider and start asking questions… Because literally anybody could pick it up with two minutes introduction and actually sensibly make use of it.'*

> (CFO CM, other CFO)

If CMs had an existing high level of knowledge of Gender Equality and Equal Opportunities policies and practices prior to attending the training, they reported that whilst they had not learnt new information the training acted as a useful 'refresher'.

In contrast, CMs with less awareness of Gender Equality and Equal Opportunities policy and practice and who did not see this as part of their role, found the training less useful. Such respondents noted, for instance, that the assessment of Gender Equality and Equal Opportunities was not something they 'lived and breathed' on a daily basis and thus, they felt training was of limited relevance. Conversely however, it may be these respondents for whom such training is of most value to educate them further on Gender Equality and Equal Opportunities.

Timing – There were concerns regarding the timeliness of the training. Perception of the usefulness of the 'toolkit' was felt to be limited if CMs had attended training when it was still being piloted. These participants asked whether this meant they would need to attend the training again once the final version of the toolkit was in place. Additionally, CMs reported that it could be difficult to make judgements about the quality of provider Gender Equality and Equal Opportunities policy and practice when what constituted good practice was still being established. Other CMs felt that they had only attended the training after the programme was underway, which meant they had not been able to benefit in the early stages of the management of their contracts. To this extent this was a concern over the timing of the training rather than of the training or toolkit per se, and given that such training may only be able to be commissioned once the programme commences, may be unavoidable. Another issue respondents raised was the need for the training to be repeated in order to include new staff within ESFD and the CFOs.

These findings highlighted that the training was useful and very well received. However, they also suggest the importance of screening who attends the training to assess the depth that could be covered or length of course required to meet the needs of different staff members. It also suggests a need for a bespoke approach for CMs from different CFOs to ensure clarity regarding their roles and responsibilities.

Indeed an important finding from the evaluation was the variation between CMs regarding the view of their role regarding Gender Equality and Equal Opportunities mainstreaming. CMs' views regarding this could be placed on a continuum, illustrated in figure 1. Where on this continuum a CM sat was not related to the CFO they represented, and there were examples of CFOs with a high level of awareness of Gender Equality and Equal Opportunities that actively promoted it within their work, as well as those who reported having more limited awareness or engagement, across the board. However this diagram indicates the variation that existed.

Figure 3.1   Continuum of CMs position in relation to Gender Equality and
          Equal Opportunities mainstreaming

Limited awareness of Gender Equality and Equal Opportunities Not viewed as appropriate to CM role	Average/limited awareness of Gender Equality and Equal Opportunities Viewed as appropriate to role	Good awareness of Gender Equality and Equal Opportunities Viewed as appropriate to CM role
		⟶
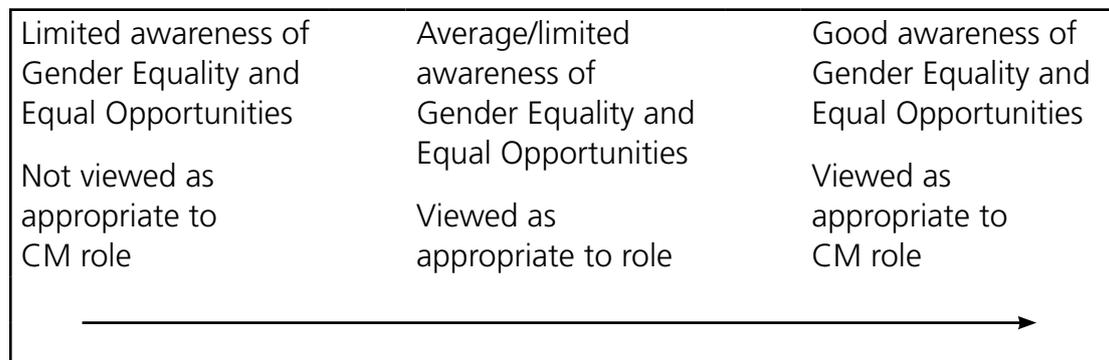
Depending on where on the continuum CMs are they may require differing level of further training and information regarding Gender Equality and Equal Opportunities mainstreaming. The CFO they represent will also affect the nature of the contract management process they undertake (explored below), therefore bespoke roles and responsibilities being set, and training tailored to represent these roles, may act to reduce the current variation in awareness or understanding that exists. There was not any indication that CMs did not view Gender Equality and Equal Opportunities as significant, rather that some felt their ability to actively promote or advise on Gender Equality and Equal Opportunities to providers was limited, in comparison to other contract management tasks they had to undertake and the knowledge they held regarding Gender Equality and Equal Opportunities.

> **Summary – Awareness and training**
> - Awareness of the plan and the concept of mainstreaming varied, often relating to whether participants had attended the training provided by ECOTEC.
>
> - The training to support the mainstreaming of Gender Equality and Equal Opportunities was well received and the toolkit felt to be a useful resource for the future. However, participants felt that the training needed to be applicable to their specific role or CFO and that it would have been useful to have received the training and toolkit earlier in the programme.
>
> - Further training on Gender Equality and Equal Opportunities could be helpful for CMs who did not have a background in Gender Equality and Equal Opportunities.
>
> - Even amongst those who had attended the training there could be confusion over the meaning of the terms or implications that mainstreaming Gender Equality and Equal Opportunities had for their day to day work and whether it applied only to procurement and service delivery or also to staffing policies and practices.
>
> - It may be possible to draw on procedures and practices in areas where awareness of Gender Equality and Equal Opportunities were relatively high, such as procurement, to improve awareness in other areas such as contract management, monitoring and staffing.

3.2   Procurement

The procurement process introduces providers to ESF policies and expectations regarding the promotion of Gender Equality and Equal Opportunities. Eligibility to compete for ESF contracts rests on the inclusion of an Equal Opportunities policy, and obtaining a contract on the capacity to engage different groups and indicate good Gender Equality and Equal Opportunities practice. Procurement could therefore be viewed as a key driver of Gender Equality and Equal Opportunities within the ESF programme and is explored in this section.

3.2.1   Procurement processes applied by CFOs

Detailed procurement processes for different CFOs, as outlined in the European Social Fund Equality and Equal Opportunities Mainstreaming Plan for England and Gibraltar, 2007-2013, are described in Appendix C. Further information about equality and diversity in the DWP's procurement and contracting process is also outlined in Appendix D. Essentially all CFOs have a process of competitive tendering, which includes questions about the way in which providers will meet Gender Equality and Equal Opportunities statutory and policy requirements. These processes vary, however.

3.2.2   Department for Work and Pensions

The Department for Work and Pensions (DWP) as a central government department, has a legal duty to comply with equality legislation and a responsibility to ensure both its contracts and suppliers do not discriminate unlawfully within the meaning of current equality legislation. Prior to the advertisement of contracts, DWP guidance confirms the benefits of procurement professionals conducting Equality Impact Assessments (EIAs) before drafting adverts for contracts and defining contract requirements.

Providers applying for a contract worth more than £50,000 of ESF funding through the DWP must be accredited, including in relation to the promotion of Gender Equality and Equal Opportunities. This process is managed for the department by Momenta. Accreditation includes assurances that providers and any subcontractors comply with legislative requirements, including equality and diversity legislation, and have an agreed equality and diversity policy. The policy must cover such issues as dealing with harassment and grievances, supplier diversity and equality training. Each contract between the DWP and a provider will require specific measures to assure that equality and diversity are addressed. This may involve ensuring protection for specific individuals or groups protected under equality legislation and exercise of public functions with a view to promoting equality and diversity.

Where contracts are granted following accreditation, assessment on performance in promoting Gender Equality and Equal Opportunities is part of the provider's self-assessment report and is discussed as a required feature at regular intervals as part of the formal review process. Information provided by suppliers on active equality policies, processes, communications, resources and training present within the organisation or relating to the services provided to the DWP should be obtained as early as possible in the procurement process and any DWP needs are specified in the contract requirements.

3.2.3   Learning and Skills Council

The Learning and Skills Council (LSC) have two processes depending on whether procurement is for the direct delivery of Education and Training or for other services.

Direct delivery of Education and Training

Organisations pre-qualify to receive Invitations to Tender (ITTs) by completing Pre Qualification Questionnaires (PQQs) on the LSC Qualified Provider Framework (QPF). If successful on the QPF organisations stay on this for up to four years subject to the regular annual refreshing of certain data including their financial accounts, health and safety record and so on. Whilst completing the PQQs, organisations select any or all of the following programme types they wish to be considered for, and if they are successful, then provision ITTs that fall under these programmes are sent to them and they can decide whether to bid or not. The programme types are – Employer Responsive, Learner Accredited or Learner Non-Accredited. ITTs are issued by LSCs to the appropriately successful organisations from the QPF.

Other services

This is also a two-part procurement process but organisations are not pre-qualified in advance. Each procurement is treated as independent of each other and consequently, if one service is procured two months later than another and an organisation wishes to be considered for both, they must complete two PQQs, and if successful at that they will receive two ITTs.

Thus, the LSC operates a two-stage open and competitive tendering process: Stage One includes a PQQ, which contains an array of questions establishing the suitability of a provider to be invited to tender for specific elements of learning and skill delivery. Stage Two is the ITT specification. Both of these stages contain assessment elements which score responses on equal opportunities as part of the ESF cross-cutting themes. The ITT specification, against which submissions are made, contains specific details of what provision is sought and in many cases specifies particular delivery targets on participant types such as sex, disability, age, ethnicity, employment status, prior skills level, etc. Performances on equal opportunities are reviewed by CMs through statistical returns and by Partnership Managers through progress reviews.

3.2.4 Other CFOs

The processes applied by other CFOs vary but they operate similar processes as applied by the DWP and LSC for determining the suitability of providers to apply for contracts. This includes a consideration of equal opportunities, and an ITT specification that includes delivery targets based on participant types by gender, disability, lone parents, older people, ethnic minority groups, people not in employment, education or training (NEETs), people with caring responsibilities, migrant workers or other disadvantaged groups, for example. The CFO is responsible for gathering Gender Equality and Equal Opportunities information and for ensuring that their providers collectively meet regional and local equality and equal opportunities targets.

Understanding of the procurement process

Unsurprisingly given it is a key aspect of their day to day work, procurement processes and how they are designed to support the promotion of Gender Equality and Equal Opportunities, at both the accreditation and tendering stage, were generally well understood by strategic stakeholders and CMs.

DWP respondents, for example, described the process of accreditation through Momenta and the process of contract reviews, although they were rarely aware of how Momenta actually made assessments, which could lead to them reportedly feeling 'removed' from the accreditation process.

LSC respondents discussed the process of accreditation using PQQs, the tendering process and related scoring in relation to Gender Equality and Equal Opportunities as a cross-cutting theme and targets related to specific participant types within a contract specification.

Other CFO respondents described a process starting from consultation with internal policy teams and external stakeholders about the range and specification of contracts to be tendered, through to assessment and scoring on Gender Equality and Equal Opportunities related to the award of contracts, and ending with induction processes for providers awarded contracts.

In terms of improving the procurement process to support Gender Equality and Equal Opportunities, it was suggested that equality advisers could be involved in discussion about the provision needed locally, and that smaller prospective providers could be supported in writing their bids (including sections on Gender Equality and Equal Opportunities). This could be achieved, for example, by running workshops for organisations interested in bidding, if they did not have a great deal of experience of responding to questions on Gender Equality and Equal Opportunities.

Role of the procurement process in promoting Gender Equality and Equal Opportunities

The value of the procurement process in terms of mainstreaming Gender Equality and Equal Opportunities was described essentially in two ways: The first was in the way that raising Gender Equality and Equal Opportunities at the procurement stage served to embed these issues in the minds of Provider project staff early on. It was thought that this raised awareness about the importance of Gender Equality and Equal Opportunities in ESF-funded activities and helped prospective providers to think through how they would address barriers to employment and training experienced by different groups, for example, by describing specific action plans to meet targets. To this extent the process could also help to ensure that Provider project staff were 'already on board' with Gender Equality and Equal Opportunities before a contract began. As a strategic participant put it:

> *'We see procurement as a really strong lever for equality because when the CFOs are considering people's bids, if they can see that the organisations that are bidding are really thinking about equality and that can be one of the standards that they use to choose organisations and it's actually quite a powerful tool because it gets people to think about it before they put the bid in.'*

(Strategic ESF stakeholder)

The second way in which the procurement process was seen to add value to the mainstreaming of Gender Equality and Equal Opportunities was in encouraging a more diverse array of providers to apply to tackle the various barriers to employment and training that recipients faced. In particular, the process was thought to promote innovation in tackling such barriers by asking providers how they would address specific disadvantages and by encouraging larger providers to subcontract to smaller providers with greater expertise in tackling barriers faced by specific groups. Such an approach was also discussed by participants in relation to the ESF's 'dual approach' to provision.

Provider project staff had mixed views about the value of the procurement process as a way to promote Gender Equality and Equal Opportunities. On the one hand, like CMs, they felt that it was a useful way to raise the profile of Gender Equality and Equal Opportunities in ESF-funded provision and to encourage Provider project staff to think through how they would help specific groups overcome barriers to training and employment. It was also thought to create a space in which it would be possible for contractors and funders to discuss these issues. On the other hand, there was a degree of cynicism that accreditation may also be a paper exercise to fulfil legal obligations on equality and that in practice greater attention was paid to value for money when contracting services than to ability to promote Gender Equality and Equal Opportunities. This was not a substantiated view, however, it does indicate that further work could be completed to educate providers on the significance of the process of accreditation and the usage to which their accreditation information is put to ensure they realise that the process is meaningfully implemented and monitored.

Challenges and concerns

Key challenges were asked about in relation to the procurement process in general, and in relation to the specific processes applied by the DWP and LSC. At a general level it was noted that larger organisations may be able to employ professional bid writers to produce their applications and answer questions on Gender Equality and Equal Opportunities. This meant that the organisations could in theory, pay 'lip service' to Gender Equality and Equal Opportunities, without staff who would be delivering the programme fully understanding equal opportunity policies or practices or how to implement them well at the ground level. At the same time, smaller organisations could be disadvantaged in writing sections of applications on Gender Equality and Equal Opportunities because of a lack of experience and resources if support was not provided to assist them. This concern posed the question of how CM staff could distinguish between provider organisations that are genuinely committed to Gender Equality and Equal Opportunities and have robust policies that are actually implemented, compared to those paying 'lip service' very well, when they themselves (as was the case with some) felt they were not 'experts' with good practice or able to make such a judgement.

This finding again highlighted the significance of the training and toolkit implemented by ECOTEC, which aimed to clarify roles, responsibility and knowledge but also indicated that more may need to be done post-training to embed this into practice. It was not felt that larger organisations did ever act below the expected level to promote Gender Equality and Equal Opportunities, even if they did employ professionals – rather the point was raised to illustrate the challenges that can be faced by CMs when assessing provider plans to be able to ensure the claims made to engage different groups will be substantiated.

Challenges from the DWP perspective focused on the roles and responsibilities of CMs in relation to the accreditation process. There was speculation about whether this process was about to be reformed, giving greater responsibility for assessment of these issues to them. Indeed, CMs questioned why they had been asked to attend training on the mainstreaming of Gender Equality and Equal Opportunities (provided by ECOTEC) unless it was to become a larger part of their role to evaluate Gender Equality and Equal Opportunities practices at application stage and as part of contract management.

Challenges for LSC CM respondents also focused on roles and knowledge about good Gender Equality and Equal Opportunities practice.

CM respondents commented that they felt they had to focus on performance targets and monitoring, and this could reduce the scope they had to promote other aspects of Gender Equality and Equal Opportunities practices. They reported that if they were to be able to promote Gender Equality and Equal Opportunities they would need a reduction in the number of contracts they managed:

> *'Between us we've got x contracts. That's the pressure that we're under at the minute. If somebody can give me something that I can just stick under their nose and say, "Ok, this is what you should be looking at, what are you going to do about it?" then all the better for me because it just takes a bit more pressure off me. If we've got to spend more time looking at* [Gender Equality and Equal Opportunities] *then something has got to give.'*

(CFO Contract Manager, DWP)

Again this concern highlighted the challenges that CMs face with regards to the resources and expertise they have, and the extent to which this enables them to adequately assess which providers implement Gender Equality and Equal Opportunities in practice or as a tick box exercise with less genuine commitment. Whilst some did feel confident with this practice, others felt that there was not scope for such assessment to lie with them.

Few challenges were raised at the Provider project staff level in terms of the procurement process but it was noted that the overall process of receiving ESF funds could be a 'paperwork' heavy exercise.

The procurement process currently acts as an important mechanism to encourage a diverse approach to provision and to meet the aim of a dual approach. However, the concept of a dual approach may need to be promoted more widely during accreditation and procurement as there were also concerns reported from niche providers that prime contractors would, in effect, phase out the dual approach by encouraging their own 'ways of working' to take precedent.

Finally, since staff involved in the writing of a bid will not always be involved in service delivery, there is a need to make sure that knowledge about the promotion of Gender Equality and Equal Opportunities is carried over from the accreditation and procurement stage into plans for service delivery. It will also be important to ensure that all prospective providers are given support (e.g. through Technical Assistance funding) to write bids that do not leave them disadvantaged by the fact

that they do not have a great deal of prior expertise to write about Gender Equality and Equal Opportunities, even if in practice they can achieve good outcomes.

Summary – Procurement

- The value of the procurement process from a management perspective was in embedding the importance of Gender Equality and Equal Opportunities early on in the contracting process and encouraging diversity and innovation in provision as part of the dual approach, which in turn provided a more flexible and tailored approach to provision.

- Providers thought the promotion of Gender Equality and Equal Opportunities through procurement helped to raise the issue of Gender Equality and Equal Opportunities early on, with the process creating a space in which such issues could be overtly discussed.

- A key challenge was the concern that the quality of a bid from a Gender Equality and Equal Opportunities perspective may reflect the skills of the individual charged with developing the bid and not necessarily an integrated commitment to Gender Equality and Equal Opportunities on the ground. Provider project staff were generally not involved in writing the bids. New ways could be found to ensure that knowledge about the promotion of Gender Equality and Equal Opportunities used in writing bids is carried over to staff involved in service delivery. This is also important because bid writers are bound to become experienced at a certain aspects of the bid writing process for ESF including those relating to Gender Equality and Equal Opportunities. The challenge is to ensure that claims made reflect the working realities of the organisation through the ongoing contract management process (explored below).

- Technical Assistance funds could also continue to be promoted to ensure that smaller providers with less experience of writing bids, but that do operate with a high level of quality Gender Equality and Equal Opportunities action in practice, are assisted to compete in the current accreditation and procurement processes

- The procurement process and its role in promoting Gender Equality and Equal Opportunities were well understood by strategic stakeholder and CM and Provider project staff. Staff from CFOs other than the DWP and LSC reported greater involvement in accreditation, procurement and subsequent contract management. DWP and LSC CMs could report feeling removed from the process due to organisations like Momenta managing accreditation but also did not feel they had capacity to take this task on themselves.

- Key implications were raised in terms of whether CMs should have the capacity or expertise to integrate additional tasks related to accreditation into their role and the type of structural and organisational changes that would be needed to support a change in their roles and responsibilities.

3.3   Contract management and delivery

The day-to-day management of providers was explored with respondents in both the strategic stakeholder interviews (with CMs) and interviews with Provider project staff to assess their views on the contract management process, and the relevance of Gender Equality and Equal Opportunities work within this process.

Significantly, the way in which contracts were managed within different CFOs could have an impact on the contract management experience for providers, and there was discussion about roles and responsibilities in this regard. These are outlined in this section.

3.3.1   Roles and responsibilities

There was considerable discussion about the scope of activities that could be included within the roles and responsibilities of CMs. Activities included as integral to contract management were:

• accreditation (e.g. checking Gender Equality and Equal Opportunities policies and practices prior to contract, ensuring that Equal Opportunities policies on staffing were available and accessible to staff);

• post-contract support (e.g. checking that the placement or content of publicity and recruitment materials for providers would not exclude or disadvantage certain groups, providing advice booklets on promoting Gender Equality and Equal Opportunities);

• statistical Gender Equality and Equal Opportunities monitoring;

• discussion of performance against targets at quarterly reviews;

• advice and support to help providers meet targets (e.g. assisting them to draw on good Gender Equality and Equal Opportunities practice from other local providers, helping them to develop action plans to meet performance targets where providers and subcontractors were falling down in this respect, being supportive rather than punitive);

• production of closure reports.

Both DWP and LSC respondents described involvement in a broadly similar range of activities related to contract management. This began with providers post-contract, examining their statistical returns on Gender Equality and Equal Opportunities to see if providers were meeting their performance and equality targets and attempting to identify potential problems. The level of contact and support, however, varied between CMs. This could include, for example, post-contract briefings with providers to establish a relationship and also offering support and advice to providers on an ongoing manner, while others saw their role in terms of monitoring information and flagging problems, if they occurred, at quarterly reviews. There was some recognition among DWP CMs that such a monitoring role was likely to be changed in the future, with providers completing a self-assessment score of their progress on Gender Equality and Equal Opportunities

targets, which would then be examined and explored with their CM. These CMs also discussed their involvement in closure reports, although these had not been undertaken at this stage in the current ESF programme.

CMs from other CFOs also tended to discuss a wide range of activities related to contract management and their involvement in the accreditation process. The types of post-contract management, monitoring and support offered are outlined here:

> *'We provide a booklet, which offers guidance and assistance in developing a* [equality] *policy with teeth, to organisations. But we would want to see specifics and the monitoring that then happens would pull out some of those specifics. For example if they made a commitment we will take steps to ensure that they advertise in places where the whole community has access. We would then want to follow with questions, you know, "when did you last recruit?" "Where did you advertise?" And look for evidence. So there should be some correlation between what is stated in the policy and what's actually* [happening]*, if you like. And, and that becomes part of the monitoring.'*

> (CFO CM, other CFO).

Notably, it was some of these elements of post-contract support and advice and support to help providers to meet targets (see above) that were thought to be most challenging for DWP and LSC CMs due to time constraints that they felt they faced. However, guidance on the promotion of Gender Equality and Equal Opportunities, and advice on how to meet targets, were seen by Provider project staff as examples of good practice in relation to contract management. For example, one provider noted the value of having a CM who not only conducted statistical monitoring, but who was also able to offer advice and support in relation to meeting Gender Equality and Equal Opportunities targets when needed:

> *'I've got a great CFO Contract Manager. Really nice guy, supportive. He says he is there if I need him, if I don't I just get on with it. He monitors the contract performance. And he does that in a couple of ways. One is just the raw statistics about number of people through the door, number into work. But the other side is I have to provide him with a quarterly equality statement about the gender, age, ethnic split, he monitors that. We look at that. He finds out what we are doing to address it… and so he says do you need any advice or want any support on this, and you know,* [and] *a couple of times we've said yes.'*

> (Strategic staff, Provider)

Therefore whilst a close relationship with providers was favoured, it was acknowledged that this was labour intensive and so could be unrealistic.

In addition to CMs, strategic stakeholders described the process of reporting Gender Equality and Equal Opportunities monitoring information from providers to ESFD as part of the process of contract management. This involved the way in which CFOs amalgamate such information from all their providers to assess performance at a CFO and/or regional level and forward this information to ESFD

(either directly or via regional Government Offices (GOs)) to provide a national picture of progress made. From the accounts given this was essentially seen as a statistical return. Individual providers were largely seen as responsible for managing any difficulties arising with specific subcontractors. This is discussed in greater detail in the next section.

3.3.2 Challenges

An issue in relation to the process of contract management of Gender Equality and Equal Opportunities was the question of which Gender Equality and Equal Opportunities-related activities lay within the scope of responsibility for CMs and which did not. At the strategic level the view was that CMs could look at compliance with Gender Equality and Equal Opportunities legislation and performance targets and support providers to integrate Gender Equality and Equal Opportunities into their practice to ensure these targets are met.

However issues were identified by CMs explaining why some felt it could be challenging to take on such a role. The first was that they felt that responsibility for monitoring performance and providing support was not clearly defined and could fall between different CM roles within a given CFO. For example, a DWP strategic stakeholder referred to a distinction between CMs and ESF managers, with the latter being viewed as having greater ability to work with providers closely and offer advice and support related to Gender Equality and Equal Opportunities. Similarly, LSC CFO CMs took the view that offering advice and support on Gender Equality and Equal Opportunities practice was the responsibility of Partnership Managers. Issues regarding who is responsible for which element of Gender Equality and Equal Opportunities are relatively straightforward to decide, disseminate and resolve. Therefore, a lack of awareness regarding roles and responsibilities could be addressed.

The second challenge was that some CMs did not feel confident that they had the knowledge or time to be able to provide advice on promoting Gender Equality and Equal Opportunities to meet targets effectively. For example, while those who had not yet attended the training provided by ECOTEC thought that such training might be sufficient to take on this role, those who had undertaken the training felt that they may be asked to assess 'too much'. Consequently, a tension had arisen for DWP and LSC CMs between contract management as a form of 'monitoring' or a form of 'evaluation and support'. Related to this tension was the view that, if CMs were to take on more evaluative and supportive roles, the tools necessary to support this work needed to be proportionate to the time that they had to undertake it. CM participants stated that although Gender Equality and Equal Opportunities were important issues, CMs had other priorities when managing a contract. Therefore it was felt that tools used to evaluate progress on Gender Equality and Equal Opportunities should avoid placing unnecessary burden on providers and CMs. There was also an emphasis on the need to avoid bureaucratic form filling. Various justifications for this were provided, however, a real tension emerged between CMs wishing to ensure the management of Gender Equality and Equal Opportunities is not just a tick box exercise, whilst also not feeling they

could not spend a great deal of time managing or understanding Gender Equality or Equal Opportunities as part of their role, given the number of contacts they managed.

The third challenge was seen in terms of whether providers could be adequately held to account on Gender Equality and Equal Opportunities performance measures. Although CMs said that they held providers to account if they did not meet their targets and asked for evidence of performance on Gender Equality and Equal Opportunities as key 'deliverables', it was also noted that non-delivery on such targets is not always linked to payments for providers. As a result Gender Equality and Equal Opportunities targets could appear to be 'far down the list' of the targets that providers had to meet, with, for example, a CM commenting that Gender Equality and Equal Opportunities were really on the 'fringes' of contract management.

As noted already, CMs felt it was the responsibility of providers and their subcontractors to comply with legislation and their contractual requirements relating to equality and equal opportunities rather than the onus being on CMs to manage this aspect of providers work. However, providers noted that advice from their CM could be 'invaluable' should problems be identified in meeting their Gender Equality and Equal Opportunities targets. In particular, some providers thought that it might be possible for CMs to facilitate the sharing between providers of good practice in tackling barriers to training and employment, either through sharing their knowledge from the management of other providers or via networking events with other providers. Concerns regarding providers being in competition with each other (and therefore unwilling to share good practice) were not substantiated by Provider project staff or CMs interviewed. Rather, it was reported that networking assisted with their overall, as well as Gender Equality and Equal Opportunities, performance because providers would be aware of where they could appropriately refer participants onto and ensure the referrals they received were appropriate to their expertise. This learning through networking between providers was also already being facilitated by CMs:

> '[Good practice] *is bringing together providers that are doing well, in these areas* [equality and diversity]*, so we may well have a provider that isn't a disability provider but it's actually doing really engaging work with a disability client group. Or a female* [black and ethnic minority] *BME group, so we may well bring that provider together with another organisation to see if they can share good practice, refer people, work together. Because organisations listen to other organisations, and sometimes more than they would listen to us. So we arrange meetings together, its very simple things like that. Facilitate contacts between the providers. And it's not just for referrals, its progression, so linking up providers just in the area that are maybe doing something completely different. You might have an* [English for Speakers of Other Languages] *ESOL provider, you might have a vocational provider, you might have something else completely different, one can potentially refer onto another….'*

(CFO CM, other CFO)

Consequently, the findings indicated that there is a need to clarify the scope of activities of CMs within CFOs, especially where different aspects of performance management fall across different roles. There is also a need to clarify the roles and responsibilities of CMs, prime contractors and subcontractors for the promotion of Gender Equality and Equal Opportunities are clearly set. This would act to support CMs to be able to focus on these roles.

Advice and support from CMs to Provider project staff was valued if they were not meeting their Gender Equality and Equal Opportunities performance targets. If the role of CMs is therefore to include post-contract evaluation, advice and support to providers, then there is also the need to ensure that CMs have the capacity and confidence to undertake this role or to facilitate networking and communication between providers, such as a lower level of contracts and time to focus on individual providers. This may have resource implications however, that makes it untenable.

Summary – Contract management and delivery

- The scope of activities reported as being undertaken by CMs varied, with a broader range of activities being undertaken in other CFOs where staff were more likely to be involved in performance on Gender Equality and Equal Opportunities from start to finish (viz. from accreditation through to post-contract support). Prime contractors also took on some of the aspects of contract management for their subcontractors.

- There was confusion over the exact role CMs had in promoting Gender Equality and Equal Opportunities, with some DWP and LSC managers finding the kind of post-contract advice and support a particularly difficult aspect of their role given the number of contracts they managed and sense that overall performance was the priority.

- Such individualised management worked best where there was an active dialogue between CMs, prime contractors and subcontractors about the reasons for specific programme targets and how provider targets on Gender Equality and Equal Opportunities. Advice and support from CMs on how to address poor performance was valued by providers, particularly where CMs could draw on their experiences of working with other providers.

  There was felt to be limited responses regarding what could be done should a provider fail to meet their equality targets, especially if overall performance was good.

3.4 Monitoring, targets and performance

In addition to procurement, the monitoring of Gender Equality and Equal Opportunities figures within ESF is another process that informs the mainstreaming process by providing information on where to target improvements and to understand current levels of participation. Meeting the targets is also an aim of the

Mainstreaming Plan. This section sets out the understanding and awareness that respondents had of the process of setting targets; monitoring progress against them; the perceived value of the monitoring process; and the challenges faced.

3.4.1   Gender Equality and Equal Opportunities targets

Process of monitoring

The ESF programme for 2007-2013 was the first time that a comprehensive set of equality targets was established across the programme at both national and regional levels. Targets relating to Gender Equality and Equal Opportunities were set at a national programme-wide level and could be adapted at regional and CFO levels in accordance with local priorities. National targets for numbers of participants accessing ESF-funded provision were set using analytical and evaluation data compiled by the DWP with reference to the overall resources available for training and support within the programme. The current programme has national targets for participants of 51 per cent females, 19 per cent participants with a disability or health condition, 19 per cent people aged 50 or over (excluding 14-19 year old NEETs and young people at risk) and 19 per cent from ethnic minority groups. ESF regional targets vary to reflect differences in regional populations to reflect that of the local population such as those relating to ethnic minority groups being set at lower levels where there is a smaller ethnic minority population.

Targets also vary according to ESF priority. Table 3.1 presents achieved totals against targets in the following areas: the proportion of female participants engaged; the proportion of participants aged over 50; the proportion of participants with a disability and; the proportion of participants from ethnic minority groups. The data has been taken from Management Information (MI) data, although the figures in the brackets show weighted results from the ESF Cohort Survey. The sample for the ESF Cohort Survey was drawn in March 2009 – hence, there is some discrepancy against the MI figures, which are to November 2009 of the programme[1].

The results show that, with the exception of in Priority Five, there was some shortfall against the targets for the proportion of female participants engaged. Results for the MI and Cohort Survey data are very similar.

According to the MI data, none of the priorities had yet met their targets for engaging participants aged over 50 (although the Cohort Survey data, which was drawn from an early version of the MI, showed that Priority One had met its

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[1]   MI data was checked as at November 2009 programming period for the following organisations: all DWP regions, all LSC regions apart from West Midlands, Yorkshire and Humber and South Yorkshire, East of England Development Agency (EEDA), Luton Borough Council, Wirral Borough Council, Liverpool City Council, London Councils and the local authorities East Midlands. For the three LSC regions that have failed to submit their data in time the reports show data up to the August 2009 programming period.

targets in this area) although the indicators, particularly in Priority One and Two, were close.

Both the Cohort Survey data and the MI showed that Priorities One and Four had successfully met their targets in terms of engaging participants with a disability or long-term limiting illness (LTLI). (Notably, the Cohort Survey found higher proportions of participants with disabilities in these priorities.) There remains some shortfall in Priorities Two and Five against this target.

In terms of engaging participants from ethnic minority groups, the MI data shows that only Priority One is not yet meeting its targets in this area (21 per cent of Priority One participants were from ethnic minority groups, against a target of 25 per cent) but is close. In contrast, targets in this area were being met in the other priorities. (Interestingly, the MI data showed a higher proportion of ethnic minority participants engaged in Priority Two than the Cohort Survey.)

Table 3.1   Targets for engaging equalities groups

	Priority 1		Priority 2		Priority 4		Priority 5	
	Target	**Achieved**	**Target**	**Achieved**	**Target**	**Achieved**	**Target**	**Achieved**
Female participants engaged	51	35 (35)	50	45 (46)	51	42 (41)	51	52 (53)
Participants aged 50+	18	17 (19)	20	19 (15)	30	19 (25)	22	17 (20)
Participants with a disability	22	32 (37)	15	7 (6)	27	44 (60)	17	9 (7)
Participants from ethnic minority groups	25	21 (20)	13	15 (7)	1	2 (2)	1	2 (2)

Targets, monitoring processes and responsibilities

CM respondents described collecting monthly monitoring data, discussion of data with Provider project staff at quarterly reviews, and discussion of provider annual reports which included self-assessments of progress on tackling barriers to training and employment related to Gender Equality and Equal Opportunities. While in general it was understood how such information was used to manage programme performance, CMs expressed uncertainty about how the self-assessments in provider reports would be used to help inform good practice on Gender Equality and Equal Opportunities in the future.

As was found to be the case in relation to contract management, there was discussion over the extent to which it was the role of contract management staff to be involved in the review of provider performance on promoting Gender Equality and Equal Opportunities. CM participants who did see these activities as their responsibility described discussing performance on targets at quarterly reviews, offering advice on recruitment of participants (e.g. advice on the wording and placing of provider/service publicity materials) and helping 'thrash out' the issues. Those who felt that such activities were not part of their role said this was because they did not feel sufficiently knowledgeable to give such advice, or because they saw it as the responsibility of the provider to be compliant with equalities legislation and to have appropriate Gender Equality and Equal Opportunities policies in place. Neither of these views was specific to particular CFOs or contract management roles.

Provider project staff were aware that there were Gender Equality and/or Equal Opportunities targets for their service. Strategic Provider project staff gave accounts of the way in which monthly Gender Equality and Equal Opportunities monitoring information is gathered, submitted to CFOs, and discussed at quarterly and annual reviews. Most operational Provider project staff were also aware of this process. Others, however, were less clear about the process of monitoring or how the information was used to help improve performance. This arose where there was felt to be poor feedback and support on performance either from CMs and/or where strategic Provider project staff failed to feed back conversations about performance with their CMs to operational Provider project staff in terms of how this might affect recruitment of recipients and service delivery. While this did not necessarily prevent improved performance on Gender Equality and Equal Opportunities, it could make operational staff sceptical about the value of gathering such information, thereby leading to it being seen as a paper exercise.

Value

Overall, strategic stakeholder and CMs saw Gender Equality and Equal Opportunities targets as a valuable way to ensure proactive recruitment of specific groups. The value of having set targets was seen in a number of ways including: raising the profile and importance of mainstreaming; identifying underperformance; and enabling a conversation to be held between CMs and providers staff about the action that needed to be undertaken to address any problems. Such value was particularly thought to be enhanced, however, when CMs had the resources and

expertise to be able to challenge providers on poor practice; and if there was a commitment among Provider project staff to address issues of Gender Equality and Equal Opportunities regardless of the fact that they were not necessarily linked to funding. Notably, the value of the process was almost invariably described in terms of improving performance by Provider project staff.

At provider level, monitoring was valued by Provider project staff in two main ways: Firstly, it raised the profile and importance of Gender Equality and Equal Opportunities among them. For example, it was observed that targets helped to keep Gender Equality and Equal Opportunities as a priority for Provider project staff when they might otherwise be eager to target easily accessible participants:

> *'People might think, "oh, you know, its going to take ages to engage with communities"… So I think it's really good to have these aspirational targets to give the kind of broad* [feeling of] *what we should be aiming for.'*

> (Operational staff, Provider)

Secondly, having targets was also thought to help identify underperformance and the appropriate action needed to address difficulties. Provider project staff respondents described having to think carefully about where they advertised their project or service in order not to exclude certain groups, thinking about 'who is coming through the door'. Thus, targets helped to promote greater 'inclusivity' in terms of who was able to access provision. Active outreach and recruiting staff from within the community being served were identified as good practice in relation to under-recruitment of particular targeted social groups. For example, outreach staff being recruited to target groups who were not accessing the service:

> *'The first two people* [workers] *on the project saw that the majority of the referrals were male, they knew they had to recruit someone that would go out to where the females were so that you weren't just taking jobcentre referrals…. How we manage it is, constantly, on a monthly basis being aware of the percentages, which are all on the Management Information system, and then just communicating, telling each other, "look we are not doing well enough on this, how can we correct it".'*

> (Strategic staff, Provider)

The exception to the support for targets was among operational Provider project staff, if the reasons for the targets and feedback on monitoring and performance were not properly communicated to them by strategic Provider project staff. In this case targets could be seen as forcing staff to focus on certain groups rather than others, which they incorrectly viewed as preventing access to training and employment 'for all' of the clients they worked with, and therefore as exclusive rather than inclusive. Full appreciation of the value of targets and monitoring therefore relies on adequate communication about the reasons for them, and why action is being taken to address them, through all levels of management and delivery of ESF-funded training.

Challenges

A number of challenges relating to monitoring, targets and their impact on the assessment of performance were identified. Most related to challenges internal to the ESF programme – such as the contractual nature of targets and the quality of recorded information, and communication about the applicability of targets – which might be easily addressed. Others related to challenges external to ESF – such as the job market during a period of recession and the impact of gender inequality and other forms of discrimination in society and employment – that were largely beyond the control of the ESF programme. These are discussed in greater detail in Chapter 4. Challenges relating to the operational aspect of monitoring and targets identified included:

Whether Gender Equality and Equal Opportunities targets are contractual and should incur a sanction if they are not met – A recurring theme among CMs and Provider project staff was that Gender Equality and Equal Opportunities targets were not linked to funding and payments and therefore not always seen to be linked to contractual obligations. A distinction was often drawn between 'contractual' and 'aspirational' targets. The former included specific numbers of participants accessing a provider/services, or outcomes such as the number of participants who achieved employment within a fixed period. These targets were specifically linked to payment of funding. The latter, including Gender Equality and Equal Opportunities targets, were seen as desirable targets which providers/services should attempt to achieve but for which there were no financial penalties during the life of the programme. While providers strived to meet Gender Equality and Equal Opportunities targets, the fact that there appeared to be no financial penalty meant that participant numbers and employment outcomes took priority over explicitly working with specific groups.

Respondents thought that the fact that Gender Equality and Equal Opportunities targets were not linked to financial penalties was appropriate however, and some CMs and Provider project staff thought that providers funded by ESF should look at the training needs of individuals rather than at factors such as gender, ethnicity, disability and age. However, this could pose a broader question about a potential lack of understanding about the concepts of inequality and disadvantage being evident. Part of the problem might be that inequality is often conceived as experienced by groups (hence, the focus on 'strands'), but Provider project staff interact with individuals with a broad range of training and/or social needs, and are reluctant to identify needs on the basis of group-based characteristics. This is a tension often found between equality policy and equality practice, and one which appears to be faced by Provider project staff within ESF during their day-to-day work. Indeed, operational Provider project staff commented that they work with anyone who needed the support they could offer, even if that would inadvertently mean they did not work with certain groups. For example, one operational Provider project staff respondent felt that learning should be accessible to participants on the basis that they were ready to learn above all else:

> *'You know it should be down to that individual whether they want to learn or not so, if they're able to achieve, if they're realistic, then "yeah, okay, we'll have targets". It's not whether the government wants us to do it or anybody wants us to do it, you know it's down to the individual needs and choices.'*

(Operational staff, Case Study)

An added dimension to this for providers was the issue of who was 'eligible' to access the provider or service. Provider project staff noted that within the context of the aims of the programme, learning or training opportunities could be restricted to 'eligible' groups such as lone parents, ex-offenders, NEETS, etc. which, while having some overlap with performance on Gender Equality and Equal Opportunities, did not always directly correspond with Gender Equality and Equal Opportunities targets. Where the purpose of targets was not fully understood this could create the impression among operational Provider project staff that access to training provision was unfair and contrary to equal opportunities:

> *'Well, let's say it wouldn't be the wide understanding of equal opps because the fact that we've got target groups is showing that you are limiting those opportunities to some groups…. Although we have got the NEET group in with our category that we can give support, they are not an actual target group. Unless of course they happen to be women or lone parents so they come into that.'*

(Operational staff, Case Study)

Not all participants took the view that poor performance in relation to Gender Equality and Equal Opportunities should not incur a financial penalty in relation to Gender Equality and Equal Opportunities targets however. CMs noted that it was a contractual obligation for providers to attempt to promote Gender Equality and Equal Opportunities and that some sanctions could be applied. Key issues, therefore, appear to be the extent to which the promotion of Gender Equality and Equal Opportunities is seen as a central activity of a provider or service in tackling barriers to training and employment; the extent which targets and monitoring as a way to achieve these aims is fully understood by those delivering the programme; and whether a system of financial penalties is seen to assist or hinder a provider or service to respond flexibly to the needs of individual recipients or groups of recipients.

The quality and interpretation of monitoring information – Here it was observed by CMs and Provider project staff that monitoring information should be interpreted carefully and not taken at face value. Two main issues were identified.

First of all, there was concern that underperformance in relation to issues such as disability might reflect misunderstanding of its definition by providers or participants' reluctance to disclose disability. Similar issues were also raised in relation to lone parenthood, criminal records, religion or belief and sexual orientation, which were all thought to be difficult topics for participants and Provider project staff when gathering monitoring information (there were organisations already monitoring

these characteristics in preparation for the Equality Act 2010 although this is not monitored formally via ESF). The result would be that figures were giving a misleading indication of provider or subcontractor performance on Gender Equality and Equal Opportunities targets. Implications arising from this are that ESFD should ensure that CFOs and Provider project staff have clear definitions of what constitutes a social characteristic such as disability in the context of the programme, and that a clear explanation is given to participants by operational Provider project staff that information on social characteristics are needed to ensure that resources are targeted at all groups.

The second issue relating to the quality and interpretation of information was that figures on Gender Equality and Equal Opportunities performance needed to be examined in relation to the life of the provider. Here it was noted that it might take some time for providers to recruit participants with different needs, with some groups taking even more time to engage. Providers should not therefore be judged too quickly on their performance in the early stages of their activities. Instead, it was expected that Gender Equality and Equal Opportunities performance would be seen in terms of 'continuous improvement', with CMs and providers reviewing progress and developing action plans to address underperformance at an appropriate stage in the life of the provider/service where issues arose.

Misunderstanding about the applicability of targets in specific localities or for specialist services – For a variety of reasons there was concern among CMs and Provider project staff about the ability of certain providers to meet equality targets. One reason was that regional targets related to ethnicity were seen as inappropriate to providers or services in certain geographical areas where the percentage of people from ethnic minority communities was very low. Another was that providers specialising in targeting specific groups such as ex-offenders, NEETS or migrants would find it impossible to reach a gender balance because the target group was likely to be predominantly male. At the same time, while it was thought that some specialist services appeared to be excellent at targeting certain groups such as women, they could lose their focus on other groups such as the people with disabilities. Finally, there was concern that matched-funded providers contributed to CFO figures on Gender Equality and Equal Opportunities performance and yet their statutory nature meant that they could not be targeted at specific groups for legal reasons (e.g. providers targeting people receiving Jobseeker's Allowance (JSA) could not only take female clients).

To some extent these concerns reflected misunderstanding by Provider project staff, or miscommunication to providers, about the way in which performance data is aggregated across all CFO provision and/or the way in which specialist provision can contribute towards overall performance on Gender Equality and Equal Opportunities in specific localities. It may therefore reflect the need of ESFD to give further consideration as to how programme targets impact in specific localities and communicate the rationale for this widely.

Notably, recipients interviewed in the Case Studies tended to see the request for Gender Equality and Equal Opportunities information as something they were used to or *'just one of those things you have to do'*, indicating the process of collecting monitoring information could be perceived to be more onerous and problematic by staff than it is by participants.

Inadequate discussions and feedback on Gender Equality and Equal Opportunities performance – Whilst providers received feedback from CMs on their performance at quarterly reviews, they could be unsure what happened to their statistical returns to CFOs, and could receive little feedback on how they contributed to performance at CFO level. In this context providers who felt they received insufficient feedback sometimes kept statistical records on their own Gender Equality and Equal Opportunities performance in addition to returning information to their CFO. This suggests that feedback on Gender Equality and Equal Opportunities performance from CFOs to providers needs to be increased, including how their contribution relates to local and national programme targets. The ability to see the 'bigger picture' might also provide a stronger motivation for providers to take a rigorous approach to monitoring.

In the absence of information fed back to them on what they were achieving in relation to Gender Equality and Equal Opportunities targets, provider operational staff also said that they would reflect on the diversity of the participants they worked with (e.g. through simple head counts of the gender, ethnicity, etc. of recipients when people were trained in groups, or an examination of forms used to evaluate the training provided to see if any issues had arisen that related to Gender Equality and Equal Opportunities). However, this duplicated effort that could be avoided if feedback on monitoring and performance as part of the contract management process was also fed back by managers of provider organisations to operational staff. This is an important process because creating such a communication chain could act as an incentive for staff to take Gender Equality and Equal Opportunities seriously when the use it is put to and how it evidences their performance is understood.

Recession – As is discussed in greater detail in Chapter 4, participants observed that it was particularly hard for providers to focus on Gender Equality and Equal Opportunities targets during a period of recession when there was pressure to help all unemployed people back into work, the majority of whom in the current recession respondents thought would be men and young people (although there has also been concern regarding the disproportionate negative impact the recession could have on groups that already appear disadvantaged within the labour market such as women or ethnic minority groups). As further evidence of this concern it was reported to be difficult to encourage employers to take on people with disabilities, health problems or a chaotic history when there was a well-qualified, non-disabled pool of unemployed workers. However, providers noted that this meant they needed to be innovative in their work to support participants in becoming ready for the job market, and encourage employers to take on participants who did not fit their typically preferred model of an employee, rather than see this as an excuse for poor performance.

3.4.2 Balanced participation

ESF committees

Another area of targets within ESF relates to the idea of balanced participation in the management and implementation of the programme. One area where this is monitored is in relation to membership of national and regional ESF committees. Simple 'head counts' are used to monitor the number of women and men participating in these committees and can be used to try to encourage more balanced membership where this was not already the case. While recognising a number of difficulties – not least patterns of gender segregation in certain areas of employment and expertise and the reliance on goodwill for participation – ESFD (2009) notes that only one of five national committees has a near gender balance (sustainable development committee) and only one of ten regional committees has at least 50 per cent women (East Midlands).

There was relatively limited discussion of balanced participation relative to Gender Equality and Equal Opportunities in CM and provider workforces. Where membership of committees was discussed the 'head counts' that were supposed to take place were seen as 'tokenistic'. This was because it was thought that committee membership was likely to be influenced by a number of factors such as who was available to attend committees and existing gender segregation in the public sector workforce or within particular organisations. ESFD may therefore need to consider how Gender Equality and Equal Opportunities policy and practice could influence a better gender balance within organisations involved in the management of ESF funding.

CFO and provider workforces

Where there was discussion of balanced participation in the management and delivery of the programme, this was characterised by confusion over whether information on these issues was being, or needed to be, gathered. There may be a need therefore for ESFD to clarify whether data on gender equality in the workforce of organisations managing or receiving ESF funding is a requirement. It may also be useful to promote good practice in achieving greater gender equality in the organisations' workforce.

As with discussion of balanced participation in committees above, the fact that certain jobs in specific sections of the labour market were more likely to be occupied by men or women was also thought to make it difficult to achieve balanced gender participation in provider workforces without addressing these issues in the wider society and in employment practices first.

Summary – Monitoring, targets and performance

- There was widespread support for the process of monitoring, the value being seen at all levels in raising the profile of Gender Equality and Equal Opportunities; identifying underperformance and taking action; promoting 'inclusivity' as is done in ESF provision. It was clear that CMs and providers attempted to achieve national and regional targets, even where it had not been possible to do so to date.

- There was controversy over the extent to which it was the role of CMs to be involved in the review of performance on promoting Gender Equality and Equal Opportunities and offering advice where action was necessary. Monitoring and performance management were enhanced in this respect where:

  – CMs were trained to interpret and evaluate rather than simply gather statistical returns;

  – two-way communication structures about performance were in place between CFOs and providers, and between provider managers and operational staff.

- Concerns were expressed about the perception of Gender Equality and Equal Opportunities targets as non-contractual, the need for careful interpretation of data, the applicability of targets in specific localities or to specialist services, adequate feedback on performance and the impact of recession on labour market discrimination.

- Solutions identified in relation to these concerns included:

  – closer integration of Gender Equality, Equal Opportunities and service or provider aims such that financial penalties to reinforce them would be unnecessary;

  – clearer definitions of social groups to be targeted and improved training related to the collection and storage of equality monitoring data;

  – further training for CMs in relation to the interpretation and feedback of monitoring data;

  – better communication about the role that Provider project staff have in meeting local and national programme targets;

  – improved feedback on Gender Equality and Equal Opportunities performance to strategic providers and operational Provider project staff;

  – better sharing of good practice on innovative ways to meet Gender Equality and Equal Opportunities targets in the context of recession.

- There was confusion over whether data should be gathered on balanced participation in the workforces of organisations managing ESF funding or delivering ESF-funded services. Monitoring of committee membership for balanced participation was largely seen as tokenistic. Identification and dissemination of good practice in achieving Gender Equality and balanced participation in employment would make monitoring more meaningful in these ways.

3.5 Knowledge, information and support

Earlier in this chapter the ECOTEC training was discussed, However, sharing and disseminating knowledge about good practice in relation to the promotion of Gender Equality and Equal Opportunities broadly, also plays an important role in mainstreaming Gender Equality and Equal Opportunities. This section looks at sources of knowledge and information that were being used, and identifies gaps.

3.5.1 General levels and sources of knowledge about Gender Equality and Equal Opportunities

As noted above, there was considerable variation in the level of knowledge that CMs had in relation to the promotion and assessment of Gender Equality and Equal Opportunities. Respondents, particularly from regional and local authority CFOs, observed that their organisations had good quality Gender Equality and Equal Opportunities policies and practices in place and that staff were required to have Equal Opportunities training upon joining the organisation and/or on a regular basis. The relationship between good equalities training and the ability of CFO staff to adequately manage the performance of their providers was clearly articulated by a participant from one such CFO:

> *'I was going to say one of the other things that we do is we make sure that all our staff are fully trained, so that, on the equalities agenda; It's what* [we] *require anyway. So therefore they then have the ability, when they go out on monitoring visits, to use that expertise to either challenge or, challenge perceptions or work with the delivery partner to make sure that they have, you know, they're being quite innovative about how they engage people.'*

> (Strategic staff/CFO CM, other CFO)

Good practice in terms of the type of training received was also described by other CFO respondents:

> *'Well, we get equalities training. So every member of staff has it. And part of the equalities training covers the legislation… part of the training looks at how legislation should be interpreted in practice. And so you know, you go through role playing scenarios. As part of the induction process everyone gets an induction to the Equal Opportunities policy so people know what they need to do if they have an issue that they raise.'*

> (CFO CM, other CFO)

In addition to training provided by their organisation, there were strategic stakeholder and CM participants with a personal commitment to Gender Equality and Equal Opportunities who sought information through their organisation's website (e.g. the DWP) or through bulletins from organisations such as the Equality and Human Rights Commission (EHRC). Thus there was a generally good level of awareness of Gender Equality and Equal Opportunities but variation to this, with also limited awareness evident.

It has already been highlighted that there was variation in knowledge about Gender Equality and Equal Opportunities policy and practice among participants from the provider Case Studies. A number of factors were related to the level of knowledge they had regarding Gender Equality and Equal Opportunities, including:

• whether or not Gender Equality and Equal Opportunities training was a mandatory requirement of the provider organisation for all staff;

• whether gathering information on Gender Equality and Equal Opportunities was seen as an organisational responsibility with dedicated staff or 'champions' to cascade information or the personal responsibility of individual staff members;

• the applicability of the Gender Equality and Equal Opportunities training to the specific work context and service delivered;

• whether or not Gender Equality and Equal Opportunities were discussed as part of regular team meetings and used as opportunities to reflect on examples of good practice;

• attempts by provider organisations to highlight examples of good practice among their staff;

• experience of Gender Equality and Equal Opportunities policy and practice from previous roles.

Good levels of knowledge were associated with Gender Equality and Equal Opportunities training being mandatory for all staff within the organisation at induction and on a regular basis; the integration of Gender Equality and Equal Opportunities issues into managerial and team meetings in ways that facilitated reflection and the sharing of good practice; the promotion and sharing of Case Studies to demonstrate how good practice was integrated into service delivery or working practices. An example of good practice in this respect was a local authority provider who described the mandatory training that they attended:

> *'What they were talking about was gender equality, disability, race, sexual orientation…. And we had sessions where there was a deliberate mix of people from across different parts of the council, and it was operated at different levels so managers got one set of training and everybody else got another set, but people were encouraged to think about how that impacted on their work and how it impacted from the service user perspective….'*

(Strategic staff, Provider)

Respondents who had used computerised and online training, however, felt there had been little or no opportunity for them to address questions raised by the training programme. It was also difficult for respondents to attend training and to keep themselves up to date if training was solely a 'personal responsibility' rather than something that should be addressed at an organisational level. Perhaps unsurprisingly poor knowledge arose where training was not mandatory, the training provided was minimal, or the participants had been unable to attend any training to date.

The responsibility for training Provider project staff on Gender Equality and Equal Opportunities rested with provider organisations rather than the CMs or ESFD. Provider project staff gained most of their knowledge on Gender Equality and Equal Opportunities policy and practice from training within their own organisation, from colleagues, or from previous work experience. However, there were instances where Provider project staff had accessed training through their CM or the ECOTEC training. In the latter case the respondent had found the trainer extremely knowledgeable and felt that the toolkit easily enabled them to assess their organisation's Equal Opportunities Policy.

3.5.2 Levels and sources of knowledge related to ESF resources

Amongst CMs and providers, those who had heard of resources such as the Equal Programme or Equal Works, felt that these acted more as a 'publicity tool' for the ESF rather than a resource that could be used to help promote and support good Gender Equality and Equal Opportunities practice. While it was useful to have access to Case Studies relating to good practice, it was thought that information was not always presented in a way that made lessons transferable to other CFOs or providers. The sites were also found to be difficult to access and to negotiate and to find the information that respondents needed. A fairly typical response to whether participants had used the Equal Works site was as follows:

> *'At the moment we've used it by twisting people's arms to give some good stories… I hope this doesn't sound like another get out… but I think Equal Works again is in the infancy of being a very helpful tool. The old website I think was superb, but it was probably a bit difficult to navigate because there was too much on it… I think we've got three examples up so far, but again being brutally candid, it's probably early days to say how much of an impact is it having and how much help is it being. It's still being constructed.'*

(CFO CM, other CFO)

It was also the case that, although some respondents had read the ESF E-zine, they could not recall useful information on the promotion of Gender Equality and Equal Opportunities.

A similar picture emerged for Provider project staff in terms of use of ESF resources. Respondents had not heard of the ESF resources nor had they used or contributed to ESF websites. In particular, it was reported that such resources could be better promoted to providers, and made more user friendly:

> Interviewer: *'Have you ever used any of the ESF resources around equal opps? I don't know if you've ever come across the Equal Programme or Equal Works or things like that?'*
>
> Participant: *'We've never really tapped into... I think we haven't, to be honest… I think the problem with a lot of stuff that comes out of ESF or comes out of the EU is, you know, there's all kinds of things that are commissioned and they're done, and then... and there isn't much emphasis put on dissemination and actually drilling it down into an accessible way that frontline delivery agencies can use. You know, it's a very practical toolkit, online resources, really simple guides, you know. We don't get to hear about them, and we often can't use them in a very accessible way, so I think that the emphasis has got to be on, if something like that exists, making sure that the CFOs are tasked with promoting it to the networks, you know.'*
>
> (Strategic staff, Provider)

CMs noted that they had encouraged their providers to submit Case Studies of good practice in promoting Gender Equality and Equal Opportunities to the ESF website. However, respondents who had done this via the Equal Works website said that they had not subsequently used the site. Another respondent had accessed a DVD produced by the ESF called 'Improving Peoples Lives', which they had found useful in terms of how to address barriers to employment and training. The overall picture, however, was of Provider project staff gaining information about Gender Equality and Equal Opportunities policy and practice from sources outside ESF. This indicates an area of improvement for ESF – to ensure that relevant and accessible information is actively disseminated to CMs and providers, thus promoting an ethos of mainstreaming of Gender Equality and Equal Opportunities that is consistent across ESF. Given the variation in language and ethos found within Equal Opportunities policies, for example, it is clear that different perspectives and ideologies (diversity management, via equal opportunities for example) are operating. Given the low level of engagement with existing resources, however, it may be that whatever good practice is adopted by ESFD, engagement may remain challenging to achieve, especially given the diversity of audiences represented by ESF providers.

3.5.3   Information and support needed to further mainstream Gender Equality and Equal Opportunities

Suggestions were made about how dissemination of good practice in relation to the promotion of Gender Equality and Equal Opportunities could be improved. These included CMs and CFOs providing opportunities for networking to share good practice in relation to the promotion of Gender Equality and Equal Opportunities. Where ESF internet resources such as Equal Works already existed, suggestions were also made about how these might be better promoted or improved.

Networking opportunities

As discussed in the section on contract management, the need for greater opportunities for networking to share good practice on mainstreaming and promoting Gender Equality and Equal Opportunities was raised consistently by CMs and Provider project staff respondents. For example, an LSC respondent said:

> *'Well, I think understanding some of the best practice, sharing the best practice is important. I think something that sets out the key requirements in terms of legislation and what the LSC is hoping the providers will do, and then moving on to say, this is what is happening to date and this is the type of thing that we'd like you to do. An event like that would be useful.'*

(CFO CM, LSC)

The idea of networking opportunities to share good practice was also something that was welcomed by Provider project staff provided they had the time and resources for staff to attend them:

> Interviewer: *'Information about good practice around gender equality and equal opps and promoting it, what would be the best way of you accessing that?'*
>
> Participant: *'Something along the lines of networking I think. I mean my own interpretation of the internet stuff is it's quite easy to, to click your way through and forget about it and not really take it in. For our provider it would be a situation where I would expect one of the management and one of the* [operational staff] *maybe to go to an event or whatever as formal, informal as that may be and then feed back to us in one of our team meeting sessions.'*

(Strategic staff, Provider)

Despite the desire for networking opportunities there was also discussion of the time limitations in relation to attending such events. A number of ideas were put forward to help mitigate these difficulties. These included holding events regionally rather than nationally and appointing champions to attend the events who could then cascade information to other colleagues. Ideas were also put forward to make the events productive and an efficient use of time. In particular, it was thought that any events should be structured and focused and supported by materials that could be handed out on the day or accessed via the Internet at a later date. Participants also identified the need for the events to be publicised through direct contact with prospective participants (e.g. through email contact) as they had little time to seek out such training and networking opportunities. Such contact should also clearly outline the purpose of such events and who should attend.

There was less emphasis on networking and the sharing of good practice on mainstreaming between CMs than on facilitating networking among Provider project staff. Nonetheless, the need to network and share good practice among CMs was also raised.

Time (or the lack of it) however, was a consistent theme in the findings. The question this poses for the implementation of Gender Equality and Equal Opportunities Policy and practice is how to deal with this lack of time? As it stands Gender Equality and Equal Opportunities can appear as a luxury, or alternatively as an extra burden. Despite the positive findings that Gender Equality and Equal Opportunities is fairly integral to the work of CMs and providers, tackling the perception that there is a lack of time to 'really' engage with Gender Equality and Equal Opportunities may be a priority for mainstreaming Gender Equality and Equal Opportunities within ESF, going forward.

Internet resource

Despite the existence of ESF resources identifying good practice on Gender Equality and Equal Opportunities, such as Equal Works, it did not appear that they were being widely used. Respondents at all levels in ESF provision felt that there was often too much information on Gender Equality and Equal Opportunities in numerous places. There were suggestions made that existing or new resources needed to be in one place, made more easily accessible and easy to navigate. The key aim of such an internet resource or database would be to provide a tool where CMs and Provider project staff could look for examples of good practice on promoting Gender Equality and Equal Opportunities in training and employment. The fact that Equal Works provides such resources may indicate that the limitation is not the existence of such a site but knowledge of it or the ability to engage with it. However, although it was thought that an internet resource could help support the promotion of Gender Equality and Equal Opportunities, respondents also said they would much prefer opportunities for face-to-face networking where they felt that they could gather information quickly and have the opportunity to ask questions.

Summary – Knowledge, information and support

- Despite attempts by ESFD to promote internet resources such as Equal Works to share good practice on Gender Equality and Equal Opportunities, these were not widely used. Key reasons for this were that participants were not aware of the resources, or where they were aware of them, that they found it difficult to find the information they needed; hard to transfer examples of good practice to their own provider or service; or they preferred face-to-face networking opportunities.

- However, the idea of a single portal for information on equality and equal opportunities was thought to be useful, particularly where it could support networking opportunities.

- There was support for greater networking between Provider project staff and CMs to share good practice on Gender Equality and Equal Opportunities, provided obstacles to attendance could be removed and the time was used in a structured and focused way. Networking opportunities needed to be promoted directly to CFO and Provider project staff (e.g. via email) since they had little time to seek such opportunities out for themselves.

3.6 Chapter summary

There was a commitment to the promotion of Gender Equality and Equal Opportunities at all levels within the ESF, although the extent to which this had been achieved varied according to different stages in the planning, delivery, monitoring and evaluation processes designed to support it. It also varied according the knowledge, skills and capacity of respondents and their views about their roles in relation to each of these stages.

It was evident that good progress had been made, especially in relation to procurement and monitoring, whereas the quality of contract management and knowledge sharing of good practice on Gender Equality and Equal Opportunities were more variable and haphazard.

The roles and responsibilities of CMs were perceived differently in different CFOs and between different individuals, with this being a particular issue in need of clarification. This uncertainty about roles and responsibilities reflected varying levels of knowledge and expertise and different levels of involvement of CMs in contract management and discussion of provider performance based on statistical monitoring.

Discussion of the performance of providers against Gender Equality and Equal Opportunities targets appeared to be an area also with a need for greater consistency of practice. There was perceived value in CMs being able to move beyond a role of statistical monitoring to an evaluative role, in which they were able to offer advice and support to providers about effectively meeting their Gender Equality and Equal Opportunities targets.

Although there was a view that Gender Equality and Equal Opportunities were already mainstreamed among providers, levels of training and knowledge were variable, both within ESF and in terms of training provided by providers themselves. There was a desire to share knowledge of good practice between CMs and Provider project staff, but existing resources and networking had not entirely served this purpose to date. ESFD may therefore wish to give consideration to specifying a minimum standard of training expected among ESF providers to encourage engagement with these resources. ESFD may also be able to contribute to this training by encouraging greater sharing of good practice on Gender Equality and Equal Opportunities across CFOs and providers through networking opportunities.

Another issue was that performance targets on Gender Equality and Equal Opportunities to date had tended to focus on access to training and employment opportunities for recipients. There was less clarity about whether the promotion of Gender Equality and Equal Opportunities within ESF should also apply to the employment practices of organisations receiving ESF funding and, if so, how this should be implemented. Despite the principle of balanced participation ESFD may need to consider whether this area of mainstreaming should receive greater attention.

4 Barriers to employment and the promotion of accessibility

Aims inherent to the 2007-2013 European Social Fund (ESF) programme lead to the promotion of Gender Equality and Equal Opportunities having an explicit focus, including:

• an onus on targeting older women and men, and providing skills training for older workers;

• recognition that there are disparities between ethnic sub-groups in the labour market and that Pakistani and Bangladeshi groups (especially women) are particularly disadvantaged and are to be targeted; and

• concerns that the representation of disabled people, according to the reported management information (MI) programme data is lower than self-declared data from the cohort survey. This may indicate that MI data underestimates the participation rates of disabled people in ESF provision. It has, therefore, been proposed that the new programme needs to actively promote disclosure of disability, in order to help beneficiaries and also to ensure that the statistical data is more accurate in this respect (Mainstreaming Plan, 2009).

In this chapter differences between diversity groups' overall engagement with ESF provision and their experience of the provision are explored. This has particular significance for mainstreaming Gender Equality and Equal Opportunities because it is crucial to explore the roles and practices that providers use to promote equality among participants and their access to ESF provision and employment and training to begin to understand disparities that may arise. The different experiences and outcomes reported in the Cohort Survey are considered alongside the findings from the qualitative Case Studies.

Key barriers to employment and training that groups may face have been subject to a number of reviews in recent years, some of which are briefly outlined below as

an introduction to this chapter (a full consideration of these factors can be found in the literature review in Appendix A). Then the experiences of ESF participants by characteristics – gender, age, ethnicity and disability – are explored in turn.

4.1 Understanding barriers to employment

The Learning and Skills Council (LSC) (2007) commissioned a review of literature on 'what works' for tackling worklessness in the UK. The LSC review drew heavily on the research by Berthoud (2003), Hasluck and Green (2007) and Ritchie *et al.* (2005). The review identified that entering and staying in employment is especially difficult for people who are disabled, have poor health, who are lone parents, members of the black and ethnic minority (BME) community, over 50 years of age or, have low or no level of qualifications. However, within each group different factors can be found to have a greater impact than others on routes into and out of employment. For example, people over 50 may have outdated skills for the current job market, face discrimination, and have low aspirations to work. For lone parents (who are often women) lack of childcare can be a problem.

In the literature review of workless people and communities by Ritchie *et al.* (2005), they noted that in communities with a high concentration of multiple deprivation and disadvantage, a 'culture' of worklessness can develop. This can in turn lead to policy measures to encourage individuals into employment being undermined by family or communal pressures. It was also reported that workless people may have previously negative experiences of work and therefore need additional support to make a transition into employment or training to overcome low job/career aspirations and expectations.

Research by Jones *et al.* (2008) also stressed that a lack of soft skills (such as confidence and self esteem) can act as a barrier to work on an individual level, but that soft skills can be promoted via the provision of training and support services, such as life coaches.

Forms of direct or indirect discrimination can also act as a barrier to employment and progression. The term 'penalty' is used to describe one group experiencing lower occupational or pay levels than another group, even with the same qualifications or capabilities (Heath and McMahon, 1995). Thus, there may be an ethnic or gender penalty found if women and ethnic minorities are paid lower than individuals who are not, but have the same level of skills and are in similar forms of employment (Crawford *et al.*, 2008). Pay discrimination is a complex issue, however. Not only are some groups routinely paid a lower level (for example women compared to men) but certain types of work are attached to lower levels of value both financially and culturally than others. These types of employment may attract already disadvantaged groups – such as women entering low paid part-time employment in caring professions, for example. This occupational segregation can operate as a form of 'indirect discrimination' as it reduces the parity individuals can have with those who predominate in higher paid professions (Tomei, 2003).

Addressing barriers to employment requires: (i) interventions that encourage and support individuals to obtain the means to overcome these barriers; and (ii) structural changes (i.e. the provision of childcare; changes in employment markets). ESF provision explicitly aims to provide services that address the barriers to employment or skills development faced by individuals in different locations. As demonstrated above, addressing barriers to employment will differ depending on the different, often multiple, disadvantages an individual has to overcome and as will be explored in this chapter, can relate to characteristics such as age or disability. It therefore falls within the explicit remit of ensuring the Gender Equality and Equal Opportunities practices are mainstreamed within ESF.

In the following sections the experiences of different groups engaging with ESF provision are outlined. The data is first presented from the Cohort Survey to indicate the rates at which the group in focus engaged with the ESF programme (particularly in Priorities One and Four, which are predominant priorities included in the Case Studies). The views from the Provider project staff and participants interviewed regarding barriers to employment and progress made to address these barriers are then outlined. Cohort Survey data is returned to where relevant to highlight the outcomes and experiences of participants engaging with the programme.

4.2   Gender

The ESF programme 2007-2013 has a particular objective to support women in the labour market. The unemployment rate for women (at 6.9 per cent) is less than that for men (at 9.1 per cent), however, women's rate of economic inactivity is much higher (42.9 per cent compared with 29.5 per cent for men) (Labour Force Survey, 2009). In the Mainstreaming Plan it was noted that gender is specified as an issue along with wider equal opportunities because:

• ESF is an EU-funded programme and the structural fund regulations give specific reference to the importance of promoting gender equality in all structural fund programmes;

• women comprise 50 per cent of the population and are therefore a significant target group for programmes; and

• all public bodies have a public duty to promote equality along the lines of ethnicity, disability, age, sexual orientation, religion and belief and gender.

Given that gender mainstreaming has been at the forefront of mainstreaming equalities, gender has particular salience in this evaluation.

The gender profile of ESF Cohort Survey respondents is shown in Table 4.1. The rate of participation among women was found in the Cohort Survey to be as follows: Priority One (35 per cent), Priority Two (46 per cent), Priority Four (41 per cent) and Priority Five (53 per cent). The specified target was for at least 51 per cent of Priority One, Four and Five respondents, and at least 50 per cent of Priority

Two respondents, to be women therefore only Priority Five was found to have met the target. (MI data closely reflected the results of the ESF Cohort Survey in this area).

Table 4.1   Age and gender, by priority

						ESF Cohort Survey
	Priority					
	1	**2**	**4**	**5**	**Total**	**Respondents**
Age and gender	**%**	**%**	**%**	**%**	**%**	
16-19	14	25	8	9	15	1,826
20-24	24	26	13	11	24	1,527
25-34	18	14	17	23	17	1,854
35-49	28	24	40	39	28	3,497
50+	16	11	23	18	15	2,214
Male	65	54	59	47	63	5,844
Female	35	46	41	53	37	5,103
Unweighted bases	*5,535*	*3,863*	*1,054*	*495*		*10,947*

There was also found to be some variation by region: for example, within Priority One, London (41 per cent), the East Midlands (41 per cent) and the South West (40 per cent) had relatively higher rates of participation among women, while the North East (26 per cent), Yorkshire and the Humber (30 per cent) and the South East (31 per cent) had lower rates. It is important the note that geographical variance may be driven by the nature of the ESF contracts awarded in different regions rather than an indication of actual variation in those regions regarding the profile of people experiencing unemployment. For example, there may be a greater number of contracts to work with people experiencing unemployment in the North than in the South. Therefore higher numbers of Priority One participants in the North does not indicate higher unemployment there rather that a higher number of contracts are being awarded there to work with unemployed participants.

Provider project staff interviewed during the Case Studies reported that working with participants of different gender was not perceived to raise particular problems. Providers taking direct referrals from jobcentres, for example, noted that they work with anyone 'who comes through their door' and therefore that they had little control over the characteristics of those they worked with, but also found them to be both men and women – although it was also conceded that referrals could be 'top heavy' with male participants.

There were concerns raised over the anticipation that providers should work with 51 per cent women, however, as this was not always deemed to be practical in the current context. The MI data in Chapter 3 showed that, as yet, this target has not been met, with the exception of Priority Five with 52 per cent women, and it is in Priority One that a much greater proportion of men are being engaged than women.

A number of reasons were provided that may explain the difficulty faced in engaging 51 per cent women in the Case Study interviews. It was noted that due to the recession and reduction of employment in occupations traditionally taken up by men, men were particularly in need of ESF services and were facing difficulty in obtaining employment. In contrast employment that women traditionally entered, such as social care or catering roles, reportedly remained buoyant, therefore women were able to obtain and remain in employment to a greater extent than men. However, caution should also be raised at this point, as it was also noted women with children or who had never entered the labour market that would have potentially considered employment and training prior to the recession may now deem this out of their reach.

The recent decline of the construction industry was also noted as a reason for men facing less employment opportunities. However, Provider project staff reported that a barrier to assisting men to overcome their unemployment could be that of aspiration to work outside their traditional sectors. An example of overcoming this barrier was given of men who had previously been employed in construction in an area of high deprivation and unemployment being offered training in IT and office skills. They were then able to access employment in office work which they would not have previously considered. However there first had to be considerable efforts made by the Provider project staff to secure 'buy in' from the men that this training was relevant to them.

Cohort Survey data (Table 4.2) indicated that men were more likely to report leaving their employment due to redundancy or end of contract than women, which lends credence to the suggestion that men are being particularly affected by an insecure job market. Women on the other hand were more likely to report leaving employment due to finding another job, which could be considered a 'positive' reason. This also may explain why more men are accessing Priority One provision – which aims to support people who are unemployed, and also have more services that take mandatory referrals from the jobcentre than the other priorities.

Table 4.2   Why people left jobs, by gender

			ESF Cohort Survey
	Gender		
	Men	**Women**	**Total**
	%	**%**	**%**
Whether left job			
Has not left job	86	90	88
Has left job	14	10	12
Why left job			
Found another job	16	24	18
To do more education and training	3	7	4
Health reasons	9	13	11
Caring responsibilities	1	3	2
Other personal reasons	17	20	18
Redundancy/end of contract	55	41	51
Other reason	45	42	44
Unweighted bases	*596*	*404*	*1,000*

Therefore the qualitative data found an interesting juxtaposition to that reported in the Cohort Survey data. Despite targets for women accessing the provision not being met, it was men that Provider project staff reported were experiencing the greatest difficulty in gaining employment and also to have lower aspirations than women to access training or employment due to the lack of perceived opportunities. However it is not possible to ascertain the veracity of this claim from the evaluation and further research into the gendered nature of current employment outcomes could be useful. Women have tended to predominate in part time employment and also have a higher level of economic inactivity than men (Crawford *et al.*, 2008 and mentioned earlier in section 4.1) therefore the picture may not be as positive for women as this finding from the evaluation would indicate.

One means by which providers attempted to overcome this was by challenging traditional gender roles. Provider project staff reported for example that they encouraged women to access taster sessions of motor mechanic courses and men to access hair and beauty courses in order to provide them with a spectrum of non-traditional opportunities from which to consider where their own occupational interests lay. This was deemed significant for forging high levels of motivation and commitment to an industry.

4.2.1   Caring responsibilities

Caring responsibilities have been perceived to act as a major barrier to entering and sustaining paid employment and due to traditional gender roles these barriers are experienced acutely by women.

The gendered nature of caring is supported by the Cohort Survey which found that eight per cent of ESF respondents in the Cohort Survey were lone parents and that lone parents were more likely to be female than male; 18 per cent of female respondents were lone parents, compared with only two per cent of male respondents. In addition, the Cohort Survey highlighted the relationship between childcare and age, finding that childcare responsibilities were more prevalent amongst those 25 to 34 (ten per cent) and 35 to 49 (15 per cent) than in other age groups.

Data from the Case Studies supports the view that for those who wish to combine caring and paid employment, responsibility for the well-being of children and older relatives impacts upon participation in the workplace. Caring responsibilities were perceived to impact upon not only entering and maintaining paid employment but also progression within the workplace. One reason given for this by Provider project staff was the discontinuity between an employer's policy and their practice in relation to supporting employees with children to balance their responsibilities. It was reported by participants interviewed that whilst employers may have provided assurances at the outset of employment about flexible working arrangements and reduced hours, in practice there was an expectation that employees will work as long as is required to complete their tasks. This can result in the employee struggling to balance caring and paid employment which may then impact upon workplace performance and may hinder progression.

Participants interviewed during the Case Studies with caring responsibilities, did not perceive that caring was a major barrier to workplace participation however, if they had adequate support to enable them to combine caring and paid employment. It was however, acknowledged that carers would not always have support networks and the childcare provision funded through ESF was therefore regarded as essential.

It is also important to note that combining childcare and employment was not always regarded as desirable by participants, and they may have wished to continue being a carer and to access training for personal or other developmental needs.

4.2.2   Outcomes and experience of ESF

Cohort Survey data was examined to consider the overall satisfaction reported with ESF provision, by gender (see table 4.3, below). The figures were similar for men and women, however women overall tended to have a higher level of satisfaction than men. It has been noted that women tended to leave their previous employment for more positive reasons than men – to do another job for example, rather than due to redundancy. It could be inferred that women therefore generally had a positive outlook on the course, rather than having accessed it because they felt they had few other options, as men who recently had been made redundant may have felt.

Table 4.3   Satisfaction by age and gender

ESF Cohort Survey

| | Age | | | | | Gender | | |
| | 16-19 | 20-24 | 25-34 | 35-49 | 50+ | Male | Female | Total |
Satisfaction	%	%	%	%	%	%	%	%
Not relevant to needs	15	24	23	23	27	24	20	22
Relevant to needs	85	76	77	77	73	76	80	78
Too basic	32	46	37	37	39	42	33	39
About right	64	51	57	59	57	54	63	57
Too advanced	4	3	6	4	4	4	4	4
Very or fairly satisfied	82	68	74	74	71	71	77	73
Neither satisfied nor dissatisfied	7	13	9	10	10	10	10	10
Fairly dissatisfied or very dissatisfied	12	20	17	16	19	19	14	17
Unweighted base	*1,824*	*1,518*	*1,849*	*3,490*	*2,207*	*5,831*	*5,085*	*10,947*

Those respondents who were unemployed before they started ESF training, and who had found work at the time of the Cohort Survey interview, were asked whether the ESF training had helped them to find work. Overall 56 per cent of women surveyed in the Cohort Survey reported the course helped a lot or a little (see table 4.5, below). This was in contrast to 44 per cent who reported that it did not help at all. 51 per cent of men reported that the course had not helped at all. It could again be inferred that different experiences by gender regarding the nature of why participants accessed the ESF provision and how they were recruited (i.e. voluntary or mandatory) may underpin this difference in satisfaction, with more men accessing ESF provision as job seekers, having been made redundant, and women accessing courses for personal and professional development. Figures provided from the Cohort Survey data illustrated how a greater proportion of men than women (66 per cent compared to 34 per cent) access ESF courses via DWP funded provision, which tends to be mandatory provision for those claiming Jobseeker's Allowance (JSA).

This assertion was further interrogated by examining satisfaction with the course by reason for attendance and by gender (see Table 4.4). This shows that there

was less gender difference between satisfaction when reason for going onto the course is taken into account with for example 52 per cent of males and 56 per cent of females that were 'made to go on it' reporting that they were fairly dissatisfied or very dissatisfied, in contrast to 11 per cent male and nine per cent female participants that decided to go on the course themselves. Of these participants, there was a rate of 81 per cent (male) and 85 per cent (female) reporting to be very or fairly satisfied with the course. Nevertheless females did tend to report slightly higher levels of satisfaction than males, whichever reason for attendance they had and there was a very high rate of satisfaction (91 per cent) amongst females who attended for 'other' unspecified reasons.

It could be asserted that the extent to which employment opportunities are available on completion of the course may also affect levels of satisfaction. The Provider project staff reported that there are currently perceived to be fewer opportunities in traditionally 'male' industries, which may explain why fewer men reported being helped by the ESF provision they accessed. Women may also seek different types of employment opportunity than men, with for example, more women seeking part time work. This finding may however also indicate that providers need to continue to ascertain the optimum means by which to support men and women to improve the positive impact that ESF courses have for both genders. This flags up a need for further research on the content and nature of courses offered, to consider if they are 'gendered' in any way that may lead to them being more helpful for the needs of women, or if this finding is an indication that women are more receptive to the positive impacts of training.

Table 4.4   Satisfaction with course by reason for attendance and gender

Base: 10,947   *ESF Cohort Survey*

Satisfaction	Made to go on it		Persuaded		Given the opportunity		Decided myself		Other	
	Male	Female	Male	Female	Male	Female	Male	Female	Male	Female
	%	%	%	%	%	%	%	%	%	%
Not relevant to needs	39	39	19	33	15	11	15	12	18	9
Relevant to needs	61	61	81	67	85	89	85	88	82	91
Too basic	58	49	46	43	29	24	34	28	33	55
About right	37	47	52	53	67	72	62	67	65	39
Too advanced	5	4	2	3	4	4	4	5	2	6
Very or fairly satisfied	52	56	73	64	85	88	81	84	73	91
Neither satisfied nor dissatisfied	15	18	10	16	7	4	7	7	13	3
Fairly dissatisfied or very dissatisfied	33	25	18	20	9	8	11	9	14	6
Unweighted base	*962*	*721*	*306*	*267*	*2,098*	*2,023*	*2,397*	*2,027*	*61*	*36*

Table 4.5   Impact of course, by gender

			ESF Cohort Survey
	Male	**Female**	**Total**
Impact of course	**%**	**%**	**%**
Helped a lot	33	39	36
Helped a little	16	17	17
Not helped at all	51	44	48
Unweighted bases	*774*	*656*	*1,430*

Regarding the types of outcomes that occurred, soft outcomes are explored in Table 4.6. Women were more likely than men to feel that the course was helping them to improve all the soft skills mentioned in the table, including 'working as part of a team' (66 per cent compared with 62 per cent) and 'expressing yourself' (68 per cent compared with 63 per cent).

Table 4.6   Soft skills, by age and gender

								ESF Cohort Survey
	Age					**Gender**		
	16-19	**20-24**	**25-34**	**35-49**	**50+**	**Male**	**Female**	**Total**
Soft skills	**%**	**%**	**%**	**%**	**%**	**%**	**%**	**%**
Expressing yourself/ communication	83	68	62	56	49	60	68	63
Working as part of a team	86	69	60	54	46	60	66	62
Solving problems	76	61	56	52	43	56	59	57
Improving motivation	81	69	66	63	53	65	68	66
Improving ability to do things independently	82	64	59	54	45	57	65	60
None of these	7	17	21	26	34	23	17	21
Unweighted bases	*1,824*	*1,518*	*1,849*	*3,490*	*2,207*	*5,831*	*5,085*	*10,916*

Case Study interviews with Provider project staff similarly reported that women sought support with developing soft skills and confidence to enter training or employment. The flexibility of ESF provision (regarding the types of activities participants could be supported to achieve for example) was cited by Provider project staff as a key factor in being able to successfully build confidence in participants. This included, for example, spending time with female participants considering what they could wear to interviews and in office environments:

'The big thing when they've been at home is their confidence. We've run ladies' workshops before and a lady came in with fabric to see what goes well with their skin tone, we'd take them into Primark and give them a tenner, and go and buy something that you can wear to an interview with the colour. So it's just confidence building. And once they've all been in a group for three days together, then they all know each other and they all come in and they've all got the same mindset, "oh, lets do some job search together" and that really helps with the women.'

(Operational staff, Provider)

Work skills gained, by gender, are reported in Table 4.7. Perhaps unsurprisingly given the overall higher rates reported by women that their course had helped them a little or a lot, women tended to report slightly higher rates of having developed their work skills due to the course, than men, in every category.

Table 4.7   Work skills, by age and gender

								ESF Cohort Survey
	Age					**Gender**		
	16-19	**20-24**	**25-34**	**35-49**	**50+**	**Male**	**Female**	**Total**
Work skills	%	%	%	%	%	%	%	%
Practical skills relating to a particular job	70	48	50	43	38	47	52	49
Basic computing or IT	49	34	35	29	29	33	36	34
Intermediate or advanced computing or IT	24	15	16	9	9	14	15	14
Study skills	41	27	25	21	16	24	29	26
Reading and writing skills	58	36	32	27	23	32	37	34
Maths and number skills	58	33	28	22	18	30	32	31
English speaking skills	46	27	27	20	17	24	30	27
Wider job skills such as admin or book-keeping	30	19	18	15	12	17	21	18
Management or leadership skills	36	19	19	16	13	19	21	20
None of these	14	28	30	35	45	32	28	31
Unweighted bases	*1,808*	*1,506*	*1,835*	*3,466*	*2,189*	*5,797*	*5,035*	*10,832*

Employment patterns reported by gender are presented in Table 4.8. There was a marked difference between men and women, with more women than men (35

per cent compared to 26 per cent) being in employment at the time of the Cohort Survey interview. (This is due, in part, to the distribution of respondents across the four priorities; relatively more men were engaged in Priority One, which has a focus on tackling worklessness – hence, the higher proportion of men who were out of work at the time of the interview.) However, almost the same percentage (17 per cent and 19 per cent) of men and women were no longer classed as unemployed at the time of the interview compared to a week before the course. However, a higher percentage of women than men were economically inactive at the time of the interview. Higher levels of economic inactivity could be due to the propensity reported for women to have caring responsibilities that lead to them being unable to enter employment.

Table 4.8   Employment patterns of course leavers, by gender

						ESF Cohort Survey
	Men			**Women**		
	12 months before course	**Week before course**	**Time of interview**	**12 months before course**	**Week before course**	**Time of interview**
Employment status	%	%	%	%	%	%
In employment	33	13	26	30	18	35
Unemployed	41	70	53	28	50	31
Economically inactive	26	17	21	42	32	33
Unweighted bases	*4,726*	*4,726*	*4,726*	*3,884*	*3,884*	*3,884*

It is also worth noting that gender categories go beyond that of male and female. Transsexuals were reported in the Case Study interviews to face particular barriers to employment, often due to stigma or discrimination. Provider project staff engaged in sustained efforts to support transsexual participants in their job search activities. This could include providing advice on becoming self-employed and utilising existing skills to enter the labour market. The difficulties these participants encountered illustrated that despite progress being made regarding gender equality, direct discrimination on the basis of gendered difference could occur and the flexible, one-to-one nature of support provided by ESF provision appeared to work well when supporting people with very specific or specialist needs, such as was found with transsexual participants. ESF provision was cited as being one of the few options open to transsexual people to gain such support, given a reported lack of trust and confidence they had towards accessing mainstream provision.

4.2.3   Ways of working

In summary, the work being done by Provider project staff to overcome gender related barriers to employment (discussed in greater detail in Section 4.2.2) include:

- challenging gendered stereotypes of work through marketing materials and taster sessions, e.g. mechanics for women and caring roles for men;

- helping female participants to develop soft skills, such as confidence, through confidence and motivation courses and one-to-one support;

- actively engaging women and men, e.g. by approaching them at school gates or sport events in the community;

- raising awareness of flexible working options, of relevant available sources of support and of financial support for childcare costs (see the Case Study below);

- promoting enhanced Gender Equality and Equal Opportunities training around gender equality and working with transgender participants.

More may need to be done however to consider the specific needs of men accessing ESF provision to ensure that they are helped. However the current economic climate and job market may be a factor that affects men's prospects and the reason why they access ESF provision (i.e. male participants tend to be mandatory compared to female), which may in turn affect people's level of satisfaction with the course, but is outside of the control of ESF.

Case Study example – Returning to work after a period of maternity leave

A participant who wished to go back to work after a period of being on maternity leave accessed an ESF provider that helped her to return to work as a Finance Manager. The provider delivered career courses which explored options for professional women who wished to return to work after maternity leave, gave advice around managing finances on part-time work and engaged employers and set up interviews with suitable participants.

With the help of the provider the participant was able to find a job that meant that she would not earn less money than she did before going on maternity leave, which was something she had been concerned about. Her new employer was also one that was happy for her to work part-time, work flexible hours and work from home when necessary to enable her to fit work around her caring responsibilities.

Summary – Gender

With explicit reference to mainstreaming gender equality within the ESF 2007-2013 programme and addressing gendered barriers to employment and training, the following can be summarised:

- gender difference was deemed to be less of a concern than other characteristics (especially ethnicity and disability) regarding discrimination and barriers to work;

- men, however, have different explanations to women for their job loss (redundancy rather than finding another job). The reasons for job loss may have affected their experiences of the course and level of satisfaction, with levels of satisfaction higher for women.

Thus, there were concerns:

- targets of engaging 51 per cent women were felt to be unrealistic in the current context and due to providers working with referrals. It appears that, particularly for Priority One providers, men make up a much greater percentage than women. A number of explanations may be given for this difficulty meeting the target:

  - men may have been facing greater barriers to employment than women due to the decline in traditionally male employment roles and growth in those traditionally taken up by women;

  - men may be more likely to access Priority One providers via jobcentre referrals due to redundancy than women.

Regarding outcomes it was reported that:

- the flexibility of ESF provision lends itself well to supporting participants in an individualised manner. This includes confidence building and working with groups that still experience direct discrimination;

- it has been inferred that outcomes may be related to factors outside the control of ESF providers. Thus, men may have reported that ESF courses helped them less than women, however, the lack of employment opportunities within traditionally male occupations may have limited providers' capacity to support men into employment, regardless of the quality of support they provided;

- gender stereotypes could be challenged to ensure both men and women achieved better employment and training outcomes. The provision of training and taster sessions in activities not traditionally associated with their gender can assist in overcoming this.

4.3   Age

Age is of particular significance within ESF. The ESF programme has a target to engage respondents aged 50 or over, in line with a European Employment Strategy objective to increase by five years, at EU level, the effective average exit

age from the labour force. Although the International Labour Organisation (ILO) definition of unemployment is relatively low for this group in the UK (currently 4.9 per cent compared with an average for all groups of working age of 8.3 per cent), people aged over 50 are more likely to be inactive – just over one-quarter of older people are inactive, compared with about one-fifth in the wider working age population (Labour Force Survey, 2009). The ESF programme also has targets for engaging young people who are not in employment, education or training (NEET). This group has a relatively high unemployment rate. The unemployment rate for 16 to 24 year olds is 20.0 per cent, compared with an average of 7.9 per cent (Office for National Statistics (ONS), 2009).

The different aspirations and experiences of older or younger ESF participants may lead to them having distinct needs which are reflected in specialist provision for those who are over 50 or under 25. In addition, age may be a determining factor in the likelihood of experiencing additional disadvantages, particularly those relating to disability or illness, with older people more likely to experience either.

Findings from the Cohort Survey indicate that Priority One had met its targets for engaging people aged over 50 in its provision; the study found that 19 per cent of Priority One respondents were aged over 50, compared with a target of 18 per cent[2]. (The latest MI indicates that the target in this area has not yet been met but is close, with 17 per cent of Priority One respondents aged over 50). There was some shortfall against this target in the other priorities, in both the MI and Cohort Survey data. Priority Four providers had a target for 30 per cent of respondents to be aged over 50, while the achieved number is 25 per cent (and 19 per cent in the MI). Cohort data shows that 15 per cent of Priority Two respondents are aged over 50, against a target of 20 per cent, while Priority Five has so far achieved a total of 20 per cent against a target of 22 per cent. (A similar pattern was found in the MI for these priorities.)

Cohort Survey data also found nine per cent of ESF respondents were NEET and aged 16 to 19 years in the week before training, and NEETs accounted for 58 per

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[2]   Targets for the proportions of respondents aged over 50, who are engaged in ESF provision, exclude young people aged 16-19.

cent of respondents aged 16 to 19. There was some variation in the proportion of NEET young people by priority: in Priorities One and Four, the proportions were ten per cent and four per cent respectively. In Priorities Two and Five, the proportions of NEET young people were five per cent and four per cent respectively.

The recession was noted as a factor to explain this in the Cohort Survey report. The unemployment rate has risen more sharply among younger age groups, who may therefore be more inclined towards ESF support. As Table 4.9 illustrates, however, the youngest and oldest age groups (16-19 and over 50) have lower proportions of people who had left their previous job due to redundancy or end of contract than those in some other age groups. This indicates that the effect of the recession may be less pronounced rather than more for these age groups, which contradicts the perceptions of providers discussed in the qualitative interviews. The Cohort Survey data does, however, mirror concerns that were raised regarding participants over 50 tending to be more likely to have poor health which compounded their lesser ability or lower aspiration to work (explored in greater detail below). Indeed, Table 4.9 only presents information about those respondents who left jobs (between starting the ESF course and the time of the interview), not those who failed to find employment at all during this period.

Table 4.9   Why people left jobs, by age

						ESF Cohort Survey
			Age			
	16-19	**20-24**	**25-34**	**35-49**	**50+**	**Total**
	%	**%**	**%**	**%**	**%**	**%**
Whether left job						
Has not left job	86	83	86	92	92	88
Has left job	14	17	14	8	8	12
Why left job						
Found another job	15	13	27	21	19	18
To do more education and training	6	7	3	2	1	4
Health reasons	8	7	12	6	30	11
Caring responsibilities	1	2	2	2	2	2
Other personal reasons	31	20	14	12	10	18
Redundancy/end of contract	38	52	54	65	38	51
Unweighted bases	*1,287*	*1,204*	*1,479*	*2,744*	*1,844*	*8,581*

Provider project staff reported that they worked with *'whoever wanted their support'* regardless of age. An exception to this were providers contracted to work only with certain age groups such as those under 25 or over 50, to whom

targeting different age groups was an integral aspect of their provision. Providers did discuss particular issues regarding the needs of different age groups. These can be summarised as relating to:

• experience;

• aspirations;

• perceived discrimination;

4.3.1   Under 25 – experience, aspirations and discrimination

Young people under 25 had limited previous employment experience or qualifications to put towards future job searches. They also had limited experience or knowledge or job searching skills, job interviews, writing CVs or awareness of the types of industries they would like to obtain employment or training within. They could also lack soft skills such as confidence or motivation, especially given the lack of practical knowledge or expertise they held.

This lack of experience, therefore, could have the effect of reducing younger people's aspirations or reinforcing negative perceptions of the type of training or employment they would be able to obtain. Given the current economic recession young people were reported to feel there were few options available. This could be especially pronounced in geographical locations with particularly high unemployment or socio-economic deprivation. For these younger people being encouraged to access training to assist with their employability was a relatively new concept and staff at provider organisations had to work with them to overcome aspirational barriers before they could then support them to actually develop new skills:

> *'A lot of the issues with our students obviously start at home and support from whoever they live with, whoever they're supported by. A lot of the time you can be preaching to them one thing and it's obviously not getting backed up.'*

(Strategic staff, Provider)

Gender and ethnicity were also reported to intersect the perceptions that younger people had regarding training and employment options open to them. For example, traditional gender roles could be reinforced by younger women prioritising starting a family and younger men entering a manual occupation.

Generally, providers working with younger people spoke of ensuring that they were able to access training to improve basic skills levels; being exposed to taster courses or work placements to build up experience and confidence in relation to training and employment; and that low aspirations had to be challenged:

> *'I think a lot of young people, even if they're not entirely sure of the route that they want to go down, if they're given the chance to have a look around the college or have a look at an application form and have one-to-one support to fill it out, it's not quite as daunting as it might've been if they weren't offered that help.'*

(Operational staff, Provider)

However, in the face of the economic recession it was also noted that there may indeed be fewer opportunities available for young people, something outside of providers' control.

4.3.2   Over 50 – experience, aspirations and discrimination

Those over 50 are also the explicit focus of ESF provision. Key barriers for older people could relate to their experience – but rather than lack of experience being problematic it was that their employment experience and skills may have become unsuitable in the current employment market. For example, an older person with limited experience of using IT may find it difficult to gain employment should they become redundant after years of working in a certain field.

There were narratives recounted in the Case Study interviews, however, of small interventions potentially leading to successful outcomes. This was attributed to older people's life skills and experience and the ability to adapt to new circumstances that this could engender. So, for example, there were cases of people over 50 being provided with work placements to build up skills and understanding in new sectors and then obtaining permanent employment following this. There were people over 50 who were educated about self-employment opportunities and adapted existing skills that they had not considered to be marketable previously, such as sewing, to become self-employed. Providing training in new technology such as IT skills could also be a successful means by which to not only increase an older person's work skills, but also confidence and aspiration to work in new environments where such skills would be required. Underpinning these interventions was action taken by providers to challenge age-related stereotypes which were held by some older workers as well as employers.

However, there could also be barriers to employment and training that related to aspirations and capabilities. It was reported by provider respondents that older people who were near to retirement age or had an illness or disability would not always consider employment as an option for them in the future (as the figures from the Cohort Survey data illustrated). This may also indicate that it is especially challenging to engage older people in ESF provision that also experience LTLI or disability. Similarly, it was reported that there was a perception amongst some older people that training provision was tailored to the needs and interests of younger people and was therefore not considered as an option. This view was reinforced by perceptions about the role and abilities of older people.

There was also a perception that employers looked more favourably upon younger people within the workplace. Participants interviewed during the Case Studies illustrated this view by providing examples of the age-related discrimination they perceived they had faced. This included an older participant who, when seeking work experience, was asked about how they would cope with being managed by an employee who was younger than them.

Providers tried to educate employers to consider older people for employment vacancies and to counter negative stereotypes by positioning experience and maturity as a selling point:

> *'We have to sort of break that barrier down and we'll use examples like* [company name] *actually don't really like younger people because they are* [perceived to be] *less reliable than the older workforce.'*

> (Operational staff, Provider)

Whether it was the case that employers actively avoid employing older people over 50 could not be ascertained from the research, however, this perception did appear to negatively impact on the aspirations and job search activities of older people who perceived themselves to have few opportunities. It is also of concern that in challenging these attitudes, negative stereotypes regarding young people may be inadvertently reinforced by Provider project staff – however well-meaning in intention.

4.3.3   Human capital

The resources and skills that an individual may have relate to different dimensions of 'capital' at their disposal. Various forms of capital can be defined, the most common being: economic capital (financial resources or income); material capital (material resources of value such as property or equipment); human capital (skills, education and knowledge) (Coleman, 1988).

Interrogating the data from the Cohort Survey on the human capital of ESF participants found some associations with the themes that emerged from the Case Study interviews. Reported human capital shortcomings were lower among respondents in the older age categories, for example, with young people aged 16 to 19 (68 per cent) and 20 to 24 (66 per cent) more likely than people in older age groups to lack recent experience of working (between 39 per cent and 55 per cent of people aged 25 and over faced this barrier). People aged 35 to 49 (50 per cent) and those aged over 50 (42 per cent) were also less likely than younger people aged 16 to 19 (62 per cent) to feel that they did not have the right skills. Indeed those over 50 were found to have less human capital shortcomings across all the age categories. This tallied with the evidence from the Case Study interviews, that older people, given small but significant interventions or advice, could adapt their existing skills to gain employment. The key barrier that was therefore reported in the Case Studies that older people encountered was that those near to retirement or with ill health may have low desire to access employment or training. Those over 50 also perceived they faced discrimination due to their age from employers despite the skills they hold (this included an over 50s participant interviewed for the evaluation).

Table 4.10   Human capital shortcomings, by age and gender

							ESF Cohort Survey
	Age					**Gender**	
	16-19	**20-24**	**25-34**	**35-49**	**50+**	**Male**	**Female**
Shortcomings	**%**	**%**	**%**	**%**	**%**	**%**	**%**
Did not have the right skills	62	60	66	50	42	57	54
Weren't any jobs where I live	65	72	70	61	60	70	57
No recent experience of working	68	66	55	49	39	54	57
Could not find suitable/ affordable childcare	0	1	6	5	1	1	6
Problems with transport or the cost of transport	37	46	42	34	30	40	35
Other	9	8	13	13	9	10	11
None of these	8	5	7	17	21	9	15
Unweighted bases	*1,492*	*991*	*951*	*1,797*	*1,253*	*3,776*	*2,723*

4.3.4   Outcomes and experiences of ESF

Cohort Survey data on satisfaction with the course (see Table 4.3) found that participants over 50 were more likely to report that the course had not been relevant to their needs than other age groups (27 per cent). However they had relatively good overall levels of satisfaction with the course (with 71 per cent reporting they were very or fairly satisfied). The youngest participants (aged 16-19) had the highest percentage reporting to be very or fairly satisfied (82 per cent) and highest percentage that reported the course had been relevant to their needs. Given that the youngest participants may have had less experience of training or education previously, it may be unsurprising that they appeared to gain the most, however these figures also raise issues about ensuring courses are relevant to different age groups, whatever their previous experiences.

Table 4.6 outlined soft skills by age and gender. A lower percentage of participants aged over 50 reported that the course assisted them develop soft skills for each skill listed, than participants from other age categories. Again, the youngest participants (aged 16-19) reported the highest percentages. Examining work skills that the course reportedly assisted participants to develop, participants over 50 reported the lowest percentages and the youngest participants the highest percentages. For example, 70 per cent of participants aged 16-19 reported practical skills relating to a particular job as an outcome of the course, compared to 30 per cent of participants over 50. The percentage of participants reporting various work skills as outcomes of the course was on a 'sliding scale' thus, the older the age category the lower the percentage that reportedly had attained each of the listed work skills.

This indicates older people appear to have developed a lower level of both work skills and soft skills as an outcome of their courses. However, the qualitative Case Study interviews found that older participants could attain particularly positive outcomes from their interaction with ESF. Therefore, further research to identify and classify the types of outcomes that are achieved for older participants and that they value most – could be a useful addition to knowledge.

Perhaps unsurprisingly given the lower rates of soft and work skills reported as outcomes of the course, and higher levels of ill health, participants aged over 50 also had a high level that reported the course had not helped them find work at all (61 per cent) (see Table 4.11) than other age categories. (This table looks at the perceived impact of the course among those who had found a job since participating in the ESF course, and who had been unemployed before starting the course.)

Table 4.11   Impact of course, by age and gender

		Age					Gender		
	16-19	**20-24**	**25-34**	**35-49**	**50+**	**Male**	**Female**	**Total**
Work skills	%	%	%	%	%	%	%	%
Helped a lot	54	28	37	35	29	33	39	36
Helped a little	13	17	15	22	10	16	17	17
Not helped at all	33	55	48	43	61	51	44	48
Unweighted bases	*208*	*219*	*256*	*457*	*286*	*774*	*656*	*1,430*

ESF Cohort Survey

However, examining employment patterns by age from the Cohort Survey data indicated an interesting, and slightly more positive, finding regarding the impact of ESF for participants of different age groups. Twenty-five per cent of participants over 50 were employed at the time of the Cohort Survey interviews compared to 15 per cent the week before the course, and 28 per cent of 16-19 year olds were employed at the time of the interview compared to 17 per cent the week before the course. Thus, there was some positive movement in terms of employment access. A higher percentage of participants aged over 50 were economically inactive at the time of the interview – however, given the higher levels that had poor health or that may have been nearing retirement (and may even have accessed the course when they had more free time due to this) this may not actually be as concerning an outcome as the figures initially indicate as they may have had less desire to actually access employment.

Table 4.12 Employment patterns of course leavers by age

ESF Cohort Survey

Employment status	16-19			Age 20-49			50+		
	12 months before course	Week before course	Time of interview	12 months before course	Week before course	Time of interview	12 months before course	Week before course	Time of interview
	%	%	%	%	%	%	%	%	%
In employment	14	17	28	34	14	30	39	15	25
Unemployed	24	60	46	39	66	47	36	53	35
Economically inactive	62	24	26	27	20	22	25	32	41
Unweighted bases	*1,299*	*1,299*	*1,299*	*5,442*	*5,442*	*5,442*	*1,846*	*1,846*	*1,846*

4.3.5   Ways of working

As discussed earlier in this chapter, both older and young people potentially face disadvantage in the labour market. Suggestions for good practice with regard to the way in which support was delivered to young people via ESF providers included the following:

• providing continuous support, which included being in contact during term time and in holidays to prevent the disengagement of young people from learning;

• providing engaging and stimulating training sessions, both in terms of content and delivery to maintain young participants' motivation to continue training;

• peer mentoring to sustain levels of motivation and interest in learning;

• delivering youth-led training sessions to give young people more involvement and ownership over what they were learning.

Good practice in helping participants aged over 50 into employment centred on:

• overcoming perceptions of employer prejudice by providing reassurances and building confidence that employers valued maturity and experience;

• creatively exploring participants' skills and considering their use in self-employment e.g. creating self-employment opportunities with sewing skills;

• sending participants on training to update employability and work-related skills to make them more relevant to current labour market needs;

• increasing motivation to enter employment and confidence in employers through arranging work placements;

• overcoming participants' unwillingness to re-enter learning by holding courses in neutral venues such as community centres so as not to be reminiscent of school classrooms.

> **Summary – Age**
>
> With explicit reference to mainstreaming equal opportunities within ESF and the significance of age to this, the following key points can be listed:
>
> - Age is a complex issue to incorporate into equal opportunity practice due to the diverse and complex needs of each individual.
>
> - Providers (unless explicitly contracted to work with a particular age group) tend to work with those who access them and do not target on the basis of age. However, whilst the Cohort Survey data indicates targets for engaging those over 50 have been met, the MI data does not, although it is close to being met.
>
> - Age particularly was reported to intersect with other characteristics such as ethnicity, gender and disability, with these other characteristics being viewed as stronger influences on participants' experiences than age.
>
> - Older participants (over 50) reported lower levels of work skills and soft skills being outcomes of the ESF course. However, positive outcomes were reported in the qualitative interviews. Further exploration of the types of skills that participants aged over 50 are seeking and attaining could assist to understand this finding in the future.
>
> - Perceived discrimination on the basis of age from employers was mentioned. This included employing young people because they could be low paid, or not considering older people for positions. The actual extent or veracity of these practices could not be ascertained from this research; however, it was of note that promoting one age group could come at the cost of indirect stereotyping of the other.

4.4   Ethnicity

The ESF programme aims to promote employment among people from ethnic minority groups, who tend to have high rates of unemployment and economic inactivity. The percentage of ethnic minority people of working age in England who are economically inactive is 32 per cent, compared with a national average of 21 per cent (NOMIS, 2009).

Cohort Survey data found that the majority of ESF respondents (82 per cent) were white (Table 4.13). Eighteen per cent of respondents reported being non-white. Seven per cent of non-white respondents were Asian or Asian British and the same proportion of people were black or black British (7 per cent). Two per cent of respondents were mixed race.

The proportion of ethnic minority groups also varied by priority. The latest MI data shows that only Priority One is not yet meeting its targets in this area (21 per cent of Priority One respondents were from an ethnic minority group, against a target of 25 per cent). By contrast, targets in this area were being met in the

other priorities. (The MI data showed a higher proportion of ethnic minority respondents engaged in Priority Two than the Cohort Survey – 15 per cent in the MI compared with only seven per cent in the Cohort Survey data, against a target of 13 per cent). Two per cent of respondents in both Priorities Four and Five were from ethnic minority groups, exceeding the target of one per cent. Table 4.13 presents a breakdown of respondents by ethnic minority group, according to data gathered in the Cohort Survey.

Regional variations have a particularly pronounced effect on ethnic minority engagement in ESF provision. London, unsurprisingly, has a far higher rate of ethnic minority participants than other regions (55 per cent), followed by the West Midlands (33 per cent). Low rates of ethnic minority engagement are also found in the other regions. These regional variations are viewed as an effect of the population, and ethnic minority targets for ESF are set regionally to reflect these differences.

Table 4.13   Ethnicity, by priority

						ESF Cohort Survey
	Priority					
	1	**2**	**4**	**5**	**Total**	**Respondents**
Ethnic group	%	%	%	%	%	
White	80	93	98	98	82	9,240
Indian	2	2	0	0	2	210
Pakistani	3	2	0	0	3	308
Bangladeshi	1	0	0	0	1	105
Other Asian	1	1	0	0	1	113
All Asian	8	4	0	0	7	736
Black Caribbean	3	1	0		3	212
Black African	5	1	0	0	4	309
Other Black	0	0	0	0	0	29
All black	9	1	0	0	7	551
Mixed race	3	1	1	1	2	214
Chinese	0	0	0	0	0	21
Other	1	0	0	0	1	98
All ethnic minority groups	20	7	2	2	18	1,620
Unweighted bases	*5,493*	*3,826*	*1,048*	*492*		*10,947*

The majority of ESF participants interviewed in the Cohort Survey also spoke English as their main language at home (95 per cent) compared to five per cent who did not.

Engaging different ethnic groups within ESF provision was discussed in relation to targets. Providers were not always clear about the criteria used for setting regional ethnicity targets (if the provider did have them) and may appreciate

further information on this in the future. It is actually very important for providers to understand the foundation of targets and why they exist – because as noted in Chapter 3, there can be a tendency towards an ethos of 'helping anyone who needs us'. Whilst this might be a good intention, it does not really support addressing ethnically based barriers or under-representation. This may have particular significance given that Priority One targets for ethnic minority groups are not yet being met

Provider project staff in regions where there were very low targets for working with ethnic minority groups noted that because there were few people from ethnic minority groups in their area, they did not expect to work with different ethnicities and may have limited experience of this. However, there were also concessions made regarding the importance of forging links with different ethnic minority communities to ensure that they are provided with the opportunity to access ESF provision even in areas where they made up a small section of the population. It was noted that there could be a risk that they are inadvertently excluded due to a perception that they do not exist. Cohort Survey data did not indicate high levels of variation regarding how ethnic minority groups heard about the course compared to non-ethnic minority participants. The exception to this was that a lower percentage of ethnic minority participants heard about the course from an employer (three per cent compared to ten per cent) and a higher percentage heard about the course from the jobcentre. (This is likely to reflect the fact that there were higher levels of ethnic minority engagement in Priority One than in the other priorities. The majority of Priority One respondents had heard about the course from a jobcentre.)

Table 4.14 How heard about the course, by disadvantaged groups

ESF Cohort Survey

| | | | | **Disadvantage** | | | | |
| Employment status | Not lone parent | Lone parent | Not carer | Carer | Not ethnic minority | Ethnic minority | No disability | Has disability |
	%	%	%	%	%	%	%	%
From a job centre	64	69	65	61	63	71	60	74
From a college/school	5	3	4	4	4	4	5	2
From a youth offending team/ probation courts	0	0	0	0	0	0	0	0
From another local community organisation	6	6	6	6	6	5	6	7
From a friend/family member	5	4	5	4	5	5	6	3
From an advert	2	2	2	4	2	4	2	3
From an employer	9	7	9	7	10	3	13	2
Other	9	8	8	12	9	7	9	9
Unweighted bases	*9,899*	*964*	*9,973*	*900*	*9,204*	*1,607*	*8,336*	*2,539*

Provider project staff's ability and motivation to engage different ethnic minority communities could also relate to personal circumstances or skills. For example in one region with a low ethnic minority population, a Provider project staff member interviewed had strong links with the Asian community and could speak other languages. They utilised these skills to inform people from the ethnic minority community about the relevance of ESF provision to them. Therefore staff, even in areas where there were low levels of actual engagement in their services from ethnic minority groups, could make attempts to ensure outreach; some also cited posters in other languages and links to trusted community groups or individuals, as key methods to do so. Completing Equality Impact Assessments (EIAs) when planning projects could assist Provider project staff to plan how to reach ethnic minority communities and ask these communities for their opinions on the best way in which to engage and support them.

A highly concerning finding however was that staff reported employer actions that they believed could constitute direct discrimination towards ethnic minority individuals. For example, cases were reported of two participants with similar qualifications applying for the same employment position, but one with a Middle Eastern name not being invited for an interview. It was not possible to verify if this was direct discrimination, however the Provider project staff respondents believed it to be.

A positive finding, however, was the extent to which discrimination of this sort was deemed wholly unacceptable by Provider project staff interviewed and that active measures to work with and promote ESF services to different ethnic minority groups, even in areas where there was traditionally a low population, was taking place. However, the mistrust and lack of understanding that led to employers being reluctant to consider ethnic minority candidates, or ethnic minority groups to consider provision such as that provided by ESF as 'not for them', was a concern reported by Provider project staff, especially (and perhaps because) this group is more likely to hear about the provision from the jobcentre than white participants (Cohort Survey data):

> *'Initially there was a whole lot of wariness* [from ethnic minority participants]. *"What do you mean you'll help me? What do you mean you might have a job? What do you mean there'll be training? Will I have to pay it back? Am I allowed?" It helped, because I speak an Asian language as well, it helped being able to be seen as just a fellow human being, not someone from the jobcentre!'*

> (Strategic staff, Provider)

An issue here could also be a lack of workforce diversity (in providers and employer organisations) meaning that ethnic minority people are always 'different'. Reviewing workforce diversity within ESF could be a first step to understanding the extent to which this could be an issue (which was not within the scope of this evaluation), and encouraging trust to be built between providers and ethnic minority communities. This could be achieved via outreach, links with community organisations and diversifying the workforce.

4.4.1 Language and immigration

Language barriers were discussed in the Case Studies and it was acknowledged that a key barrier to employment and training for some ethnic minority groups (and white migrant groups such as those from Eastern Europe) was a lack of English language proficiency. However, as stated already this was the case for only a small number of participants currently accessing ESF provision. This did not only directly impact on the ability to job search, or to take up training or employment but also impacted negatively on confidence and motivation. For example, if an individual found it difficult to understand or write English they had low levels of confidence regarding their ability to access employment even if they had the skills to do so. Therefore, assisting with English language proficiency was another key

point of good practice reported within the Case Studies, which required English for Speakers of Other Languages (ESOL) training to be widely available. Additional barriers to employment that migrant groups faced included difficulty transferring qualifications into a UK equivalent.

4.4.2   Outcomes and experience of ESF

An interesting finding from the Cohort Survey could further evidence the importance of working with ethnic minority groups within ESF. Across each of the soft skills asked about (except problem solving) ethnic minority participants were the most likely group to be gaining in these areas from the course.

Regarding work skills (see Table 4.22) a slightly higher percentage of ethnic minority participants reported work skills as outcomes of the course than white participants. Therefore, ethnic minority participants appear to gain in terms of both work and soft skills from ESF provision. Examining overall impact (in terms of whether the course had helped previously unemployed or inactive respondents to find work) however, indicates that ethnic minority participants found the course as helpful and were as satisfied as white participants, with little difference between them (see Tables 4.15 and 4.16). For example, it was reported that the course helped a little or a lot by 52 per cent of white participants and 51 per cent of ethnic minority participants.

Table 4.15 Soft skills, by disadvantage

ESF Cohort Survey

Soft skills	Not lone parent %	Lone parent %	Not carer %	Carer %	Disadvantage White %	Ethnic minority group %	No disability %	Has a disability %	Has qualifications %	No qualifications %
Expressing yourself/ communication	63	65	63	60	61	71	67	55	63	62
Working as part of a team	62	62	63	58	61	70	69	49	63	60
Solving problems	57	55	57	57	57	59	62	46	58	53
Improving motivation	66	67	66	66	65	74	70	58	68	59
Improving ability to do things independently	60	62	60	59	59	66	65	50	61	57
None of these	21	20	21	23	22	14	17	30	20	28
Unweighted bases	*9,923*	*961*	*9,992*	*902*	*9,218*	*1,613*	*8,354*	*2,542*	*9,462*	*1,440*

Table 4.16   Impact of course, by ethnicity

			ESF Cohort Survey
	White	**Ethnic minority groups**	**Total**
Impact of course	**%**	**%**	**%**
Helped a lot	35	36	36
Helped a little	17	15	17
Not helped at all	48	49	48
Unweighted bases	*1,211*	*211*	*1,430*

Similarly, there was an 18 per cent change in the percentage of white participants who were unemployed before the course and at the time of the interview and a 19 per cent change for ethnic minority participants (see Table 4.18). Therefore, whilst it was noted in the Case Study interviews that active outreach was required to ensure that ethnic minority groups access ESF provision, once engaged within the provision they appeared to have similar experiences and levels of satisfaction to white participants, the exception being that ethnic minority participants tended to report both soft skills and work skills as outcomes to a slightly higher extent than white groups. Given the relatively high levels of unemployment experienced by some ethnic minority groups, this pointed to the importance of ESF to support their skill development.

Table 4.17 Satisfaction by disadvantage

ESF Cohort Survey

Satisfaction	Not lone parent %	Lone parent %	Not carer %	Carer %	White %	Disadvantage Ethnic minority group %	No disability or LTLI %	Has a disability or LTLI %	Has qualifications %	No qualifications %
Not relevant to needs	23	18	22	27	23	21	19	30	22	24
Relevant to needs	77	82	78	73	77	79	81	70	78	76
Too basic	39	30	39	36	41	20	38	40	40	30
About right	57	64	57	59	59	73	58	55	57	61
Too advanced	4	6	4	5	0	6	4	5	3	8
Very or fairly satisfied	72	82	73	73	73	73	76	67	73	73
Neither satisfied nor dissatisfied	10	8	10	8	10	11	9	12	10	8
Fairly dissatisfied or very dissatisfied	18	10	17	18	17	16	15	22	17	19
Unweighted base	*9,923*	*961*	*9,992*	*902*	*9,218*	*1,613*	*8,354*	*2,542*	*9,462*	*1,440*

Table 4.18   Employment patterns of course leavers, by ethnicity

	White			All ethnic minority groups		
						ESF Cohort Survey
	12 months before course	Week before course	Time of interview	12 months before course	Week before course	Time of interview
Employment status	%	%	%	%	%	%
In employment	34	16	30	22	8	24
Unemployed	36	62	44	41	68	49
Economically inactive	30	22	25	38	25	27
Unweighted bases	*7,249*	*7,249*	*7,249*	*1,286*	*1,286*	*1,286*

4.4.3   Ways of working

The main ways in which ESF-funded providers supported participants from ethnic minority groups to overcome barriers to employment included increasing the engagement and participation of ethnic minority individuals with ESF-funded providers. A range of methods were undertaken to do this and to better help meet and understand their needs.

These included:

• arranging outreach events designed to target specific ethnic minority communities. For example, a Case Study provider, in consultation with elders of a local ethnic minority community, held an outreach event which was well attended and had led to a significant increase in the participation of community members in the provider;

• forging links with ethnic minority community and voluntary sector groups to raise awareness of ESF providers. This route was seen as more effective than advertising in places like Jobcentre Plus offices because the relevant groups would be more likely to access them, and as trusted channels they could help to overcome negative perceptions, suspicion or wariness of employment-related services;

• learning from community and voluntary groups about issues facing different participant groups and of the best ways to provide help and support to them;

• employing staff that could communicate with individuals for whom English was not the first language in their own languages in order to better understand and meet their needs and also to help more widely raise awareness of the relevance of ESF provision amongst non-English speaking communities e.g. by creating posters in other languages;

• helping participants to have their qualifications and skills recognised in the UK by raising awareness of qualifications that could be recognised in the UK or of qualification conversion programmes.

Summary – Ethnicity

With explicit reference to mainstreaming equal opportunities within ESF and the significance of ethnicity to this the following key points can be taken from this summary section:

- Providers in areas with low population levels of ethnic minority groups have limited experience of working with non-white groups. Some Provider project staff were keen to incorporate ethnic minority groups and actively work with them; however, some felt this had little relevance to their role.

- Criteria for ESF targets for working with ethnic minority groups in different regions were not well understood. Given that targets have yet to be met for Priority One dissemination of the importance of utilising different methods outlined here to engage ethnic minority groups and of the need to address targets, could be particularly useful.

- Barriers to accessing ESF provision for ethnic minority groups could hinge on a lack of awareness that the provision was relevant to their needs.

- Once engaged with ESF, ethnic minority participants had similar levels of satisfaction to white participants but reported slightly higher percentages of work and soft skills being achieved as outcomes.

However:

- concerns regarding direct discrimination by employers were raised by Provider project staff;

- the need to promote equalities and avoid discrimination, using drivers such as legislation and policies was therefore acknowledged as highly important by Provider project staff.

4.5   Disability

Another important group of interest for the ESF programme is respondents with a disability or long-term limiting illness (LTLI). About 18 per cent of the working age population in England have a disability (either day-to-day activity disabled or work-limiting or both), and over 2.5 million people are on Incapacity Benefit or Employment Support Allowance (NOMIS, 2009).

Of the total Cohort Survey sample, 32 per cent of respondents had a long-term illness, health problem or disability which limited their daily activities or the work that they could do. The proportion of respondents with a disability or LTLI varied by priority, and was notably high within Priority One (37 per cent compared with a target of 18 per cent although the MI figure was slightly lower at 32 per cent) and Priority Four (60 per cent compared with a target of 27 per cent, while again the MI figure was lower at 44 per cent). Of the Cohort Survey respondents who had a disability or LTLI, 47 per cent had a physical disability, 37 per cent had a long-term illness and 27 per cent had a mental health problem (Table 4.19).

Table 4.19   Disability and LTLI, by priority

						ESF Cohort Survey
	Priority					
	1	**2**	**4**	**5**	**Total**	**Respondents**
Disability	%	%	%	%	%	
No disability or LTLI	63	94	40	93	68	8,370
Physical disability	47	42	53	62	47	1,271
Learning disability/ difficulty	5	11	7	0	5	172
Mental health problem	27	10	30	20	27	608
Long-term illness	37	37	31	30	37	878
Another type of disability or LTLI	4	11	4	0	4	110
Any disability or LTLI	37	6	60	7	32	2,556
Black African	5	1	0	0	4	309
Other black	0	0	0	0	0	29
All black	9	1	0	0	7	551
Mixed race	3	1	1	1	2	214
Chinese	0	0	0	0	0	21
Other	1	0	0	0	1	98
All ethnic minority groups	20	7	2	2	18	1,620
Unweighted bases	*5,528*	*3,851*	*1,053*	*494*		*10,926*

Interestingly, disability was associated with gender and age (Table 4.20). Female respondents were more likely than male respondents to have a disability (35 per cent compared with 31 per cent). Older people were also more likely to say they had a disability or LTLI – for example, 58 per cent of those aged over 50 had a disability or LTLI, compared with nine per cent of those aged 16-19.

Table 4.20   Disability and long-term limiting illness, by age and gender

							ESF Cohort Survey
			Age			Gender	
	16-19	20-24	25-34	35-49	50+	Male	Female
Disability	%	%	%	%	%	%	%
No disability or LTLI	91	81	71	55	42	69	65
Any disability or LTLI	9	19	29	45	58	31	35
Unweighted bases	*1,824*	*1,525*	*1,852*	*3,494*	*2,206*	*5,832*	*5,094*

The proportion of people with a disability or LTLI also varied by region. For example, in Priority One, Merseyside (19 per cent), the North East (21 per cent) and South Yorkshire (23 per cent) had the smallest proportions of respondents with a disability or LTLI, while London (51 per cent), the South West (47 per cent) and the East Midlands (45 per cent) had the highest proportions. This may be more a reflection of the type of ESF provision contracted in the area and nature of the participants, than of regional variations in levels of disability in the population however, and should be interpreted carefully.

Clearly the Cohort Survey data indicated that there has been a high level of people with disabilities engaging with ESF provision in this programme and targets for Priorities One and Four engagement have been exceeded. Explaining this, provider respondents noted that they had previously encountered difficulties in the programme regarding the disclosure of disabilities and that this was an issue they had explicitly worked to overcome. Participants with an illness such as diabetes, for example, may not have classed themselves as having an LTLI until a staff member discussed this with them.

Provider project staff noted that when working with people with disabilities, as with every participant they worked with, the key aim was to identify the individual needs and how these could be met. This reiterates an ethos reported throughout the Provider project staff interviews. However, it may indicate a lack of understanding regarding equalities – in this case, disabilities – and the very specific forms of discrimination different groups may experience. Given the abstract and specialist nature of this understanding, it is perhaps not surprising, however it is an important point because it could implicitly reduce the extent to which Gender Equality and Equal Opportunities could claim to be mainstreamed within ESF, if an awareness of disadvantage based on shared characteristics such as disability, is not taken into account by providers.

Barriers to employment that people with disabilities faced included: discriminatory attitudes by employers being unwilling or unable to make adjustments for them (which are required by law and therefore a serious omission); facilities such as training locations being unsuitable; and individuals perceiving that they could not work due to their disability. Unsurprisingly Cohort Survey data illustrated that participants with disabilities were more likely to have left their job due to health reasons than non-disabled participants (see Table 4.21).

Table 4.21   Why people left jobs, by disability

			ESF Cohort Survey
		Disability	
	Non-disabled	**Disabled**	**Total**
Whether left job	%	%	%
Has not left job	85	93	88
Has left job	15	7	12
Why left job			
Found another job	20	13	18
To do more education and training	5	2	4
Health reasons	6	30	11
Caring responsibilities	1	4	2
Other personal reasons	19	15	18
Redundancy/end of contract	52	46	51
Other reason	42	56	44
Unweighted bases	*825*	*174*	*1,000*

Participants who reported a disability in the Case Study interviews felt that continued efforts are required in order to challenge negative attitudes towards disability within the workplace. It was perceived that despite growth in equalities legislation, some employers are fearful of disability and as such are reluctant to engage with candidates with disabilities. It is important to note that these attitudes were not perceived to be limited to employers but were reported to extend to organisations delivering services to support individuals to enter work experience, training or employment. Experiences of ESF provision were presented as being highly positive, in contrast to negative prior experiences.

Provider project staff reported that there was a variety of methods that could be used to assist people with disabilities to access training and employment. This included linking employers or training providers to specialist agencies or equipment that could facilitate access – for example, simple measures such as obtaining screens for PCs that allow them to be enlarged and read by people with sight impairment. By providing people with disabilities with the knowledge that they could access employment or training, this could also inspire them to seek work and negate the negative impact of discrimination that people with disabilities perceived that they would face should

they seek employment. This could again require simple methods, such as explaining the types of support or training that was available, or providing staged entry to training with taster sessions initially to allow people to build confidence in their ability before committing to longer-term training or employment. The dual approach that ESF advocates and niche provision funded was particularly noted as a positive aspect for promoting the needs of disabled people:

> *'And so mainstream government provision doesn't necessarily, and larger contracts doesn't necessarily, meet the needs of specific disability groups. And I think that's the beauty of ESF is actually looking at the niche areas.'*

(Strategic staff, Provider)

Case Study providers included those that provided specialist assistance to people with disabilities who obviously reported specialist knowledge in this subject matter. However, mainstream providers, with a range of services and participants, could be concerned they lacked the expertise or knowledge to work with individuals with a disability, and would prefer to refer them to specialist providers or subcontractors. The nature of the illness or disability experienced could also affect this. Participants with mental ill health were reported to require more holistic ongoing support than participants with practical needs, such as those requiring equipment, that could be addressed in a straightforward manner:

> *'Often the hidden barriers are for people who've got the mental ill health, it's not an obvious thing, and so, once they've decided that they're coming along, each week you can see them getting better and their timekeeping gets a little bit better.'*

(Operational staff, Provider)

4.5.1   Outcomes and experience of ESF

There was an acknowledgement from Provider project staff that for some people with a disability or long-term illness work was not a practical option in the short term for them but they would gain other outcomes from ESF. As the Cohort Survey data disaggregated by characteristics, on work skills gained illustrates, respondents with a disability or LTLI were less likely than those without a disability or LTLI to be gaining all the types of work skills (including practical skills relating to a particular job, reading and writing skills, computing, maths and number skills, English speaking skills, study skills, management and leadership skills and wider job skills). They were also less likely to report soft skills as outcomes than other groups (see Table 4.15).

Table 4.22 Work skills, by disadvantage

ESF Cohort Survey

Work skills	Not lone parent %	Lone parent %	Not carer %	Carer %	White %	Disadvantage Ethnic minority group %	No disability or LTLI %	Has a disability or LTLI %	Has qualifications %	No qualifications %
Practical skills relating to a particular job	49	46	49	50	48	51	56	34	50	44
Basic computing or IT	34	31	34	33	33	39	38	27	34	34
Intermediate or advanced computing or IT	14	10	14	15	14	16	17	9	15	10
Study skills	26	24	25	29	25	28	29	19	26	22
Reading and writing skills	34	30	34	32	33	41	37	27	33	37
Maths and number skills	31	23	31	28	30	33	35	21	30	33
English speaking skills	27	22	26	28	24	40	30	20	26	28
Wider job skills such as admin or book-keeping	18	17	18	21	17	21	20	13	19	12
Management or leadership skills	20	18	20	19	20	20	24	11	21	14
None of these	30	35	31	32	32	26	24	46	30	32
Unweighted bases	*9,850*	*950*	*9,915*	*895*	*9,159*	*1,587*	*8,293*	*2,520*	*9,407*	*1,411*

Nevertheless, with support and advice people with disabilities were able to access employment. A participant interviewed, for example, was dyslexic and had experienced severe depression. However, they had now entered employment, working in community engagement, and were working to support people to access training and employment opportunities themselves. Indeed, this type of community work was noted to be particularly successful, with Provider project staff drawing on personal experiences, such as being a lone parent, to mentor and to advise participants (ways of working within ESF to promote access is discussed further in section 4.6). Therefore the Case Study data indicated the importance of the niche and flexible provision ESF provided to people with disabilities, often in the face of few other available training and employment skills support options.

Examining the overall impact of courses by disability however, (among respondents who had found work since attending the ESF course, and who had previously been unemployed) from the Cohort Survey, illustrates that a higher percentage (55 per cent) of disabled participants report that the course did not help them at all, compared to non-disabled (46 per cent). This may be unsurprising given the lower levels of soft and work skills reported as outcomes. However, the positive findings from the qualitative research indicate the value of ESF for some participants with disabilities, especially regarding the flexibility and opportunity for one-to-one, tailored support. Further research would be useful to identify disabled participants' needs and desires when accessing ESF provision in order to ensure that the impacts are accurately understood and measured.

Table 4.23   Impact of course, by disability

			ESF Cohort Survey
		Disability	
	Non-disabled	**Disabled**	**Total**
Impact of course	**%**	**%**	**%**
Helped a lot	38	26	36
Helped a little	16	19	17
Not helped at all	46	55	48
Unweighted bases	*1,166*	*262*	*1,430*

The data on employment patterns from the Cohort Survey indicated mixed results regarding impacts for people with disabilities. Although a higher percentage of disabled participants were employed at the time of the interview than had been the week before the course, there was also a higher percentage now economically inactive. Overall figures compared to participants without a disability also showed that a much higher percentage of non-disabled participants were in employment at the time of the interview per se.

Table 4.24   Employment status of course leavers, by disability

	White			All ethnic minority groups		
	12 months before course	Week before course	Time of interview	12 months before course	Week before course	Time of interview
Employment status	%	%	%	%	%	%
In employment	35	19	36	26	6	15
Unemployed	38	69	50	34	50	34
Economically inactive	27	12	14	41	44	51
Unweighted bases	*6,586*	*6,586*	*6,586*	*2,009*	*2,009*	*2,009*

ESF Cohort Survey

Thus, participants with disabilities may benefit especially from support such as that provided by ESF, however the exact nature of what they do gain with regards to work skills and soft skills due to ESF may require further research and examination.

4.5.2   Ways of working

Key points of good practice to promote Equal Opportunities for people with disabilities included:

• Offering flexible provision and services. For example, more flexible degree course structures allowed participants to more easily access provision and to progress incrementally and still gain qualifications even if they were unable to complete a full degree.

• Offering accessible opportunities for remote working, one-to-one support to participants and provision of support as many times as was necessary for participants, e.g. participants with learning disabilities.

• Being able to refer participants to more specialist niche support if individual providers were unable to meet participants' needs themselves.

• Helping to make employers more aware that often simple adjustments could be made to facilitate a suitable working environment for people with disabilities and providing them with advice and support around this.

• Tackling employer perceptions that making adjustments was not financially viable by providing information on the Government's Access to Work scheme.

• Challenging employers' and participants' assumptions that they could not engage in paid work because of disability by arranging work taster sessions.

Summary – Disability

With explicit reference to mainstreaming gender equality within the ESF 2007-2013 programme and addressing barriers to employment and training, the following can be summarised:

- Provider project staff find disability more challenging to address than other disadvantages, if they feel they lack specialist skill or knowledge around this area.

- However, targets have been met in both Priorities One and Four (but not Two and Five). This may also be affected by providers encouraging participants to disclose disabilities to a greater extent.

- Participants with disabilities reported lower levels of soft and work skills as outcomes from ESF courses than non-disabled participants. Further research into the needs of disabled participants and what they do gain from engagement with ESF provision could be useful.

However:

- simple measures could be adopted to address the barriers faced by participants with a disability, such as putting employers in contact with specialist agencies that offer advice or equipment for people with disabilities free of charge;

- specialist niche support funded by ESF or via subcontractors was noted to be of particular significance for meeting the needs of those with different disabilities;

- flexibility was also reported to be key when working with people with disabilities (i.e. they may be unable to attend training or meetings at short notice or they become ill). Again ESF provision was viewed as allowing for this flexibility to a greater degree than mainstream provision.

4.6 Overcoming barriers and mainstreaming Gender Equality and Equal Opportunities within ESF

In this section ways in which ESF-funded providers work to promote Gender Equality and Equal Opportunities and support participants to overcome the barriers to employment is explored in more detail and overarching examples of good practice, which could be seen to apply to working with all participant groups, are outlined.

4.6.1 Ways of working to overcome barriers to employment and accessibility

Despite the fact that many of the Case Study providers provided specialist support designed to tackle the barriers to learning and employment faced by specific participant groups, such as women, people with disabilities or young people, a number of suggestions for good practice that would act to promote accessibility and equality within ESF provision were made. These could be viewed as important for providing improved services to all participants, thus promoting equalities, inadvertently.

4.6.2 Employer engagement

ESF providers played an important role in promoting accessibility to the workforce for their participants by actively engaging with employers in their area to promote an understanding and awareness of the needs and abilities of different groups

Effective employer engagement activities are key in creating employment opportunities for participants. An 'active' approach on the part of Provider project staff with direct contact and relationships with local employers was recommended. It was important that relationships were sustained; involving regular and long-term communication about job opportunities and of suitable candidates for jobs. This was seen to be very important, particularly in the context of recession, as it was remarked that although opportunities did not always exist when employers were first approached by providers, employers would be more likely to notify them of any vacancies that arose at a later date if the two parties continued to be in contact. Furthermore, providers were making use of Government stimulus packages such as the Future Jobs Fund to help employers to create job and placement opportunities.

Active engagement with employers was also noted as having particular relevance to Gender Equality and Equal Opportunities if it involved challenging employers' perceptions of taking on staff with different characteristics, such as migrants, people with disabilities or younger or older participants than they normally worked with. For example, Work Trials had been arranged by providers for participants that employers had expressed doubts about. Through this process they had succeeded in changing employers' views and participants had gained longer-term employment.

4.6.3 Active outreach to participant groups

As noted earlier in the chapter, recruiting participants through outreach activities was another way of working that promoted accessibility to ESF providers for participants with diverse characteristics. It could also assist provider workers with an understanding of the different needs and aspirations of different groups. Effective outreach involved attending participant providers such as community centres, craft and sports clubs, charity shops and school gates where people who may not normally have considered ESF provision, but could benefit from the support provided, gather and feel comfortable.

Events aimed at specific communities were also effective ways of engaging new participants, particularly those from ethnic minority communities, as were contacts with established voluntary and community sector organisations. Such links were seen as important not only to engage new participant groups but also to provide good signposting and referral services. Provider workers valued a thorough knowledge of all related services and the building of links with such services to ensure participants were referred to the appropriate support if the provider was unable to provide it itself and also to build individuals' knowledge of the best ways in which to support a diverse range of participants.

Activities such as 'active' employer engagement, including the use of Government stimulus packages, sustained relationships with employers, and work done by providers to challenge employer perceptions, demonstrate a sustained and pro-active approach to promoting equal opportunities, a key point in the Mainstreaming Plan. Moreover, active outreach initiatives, even in areas with low representation of minority groups, show a commitment of ESF providers to widening accessibility and equality of opportunity for a diverse range of participant groups. Thus, a commitment to Gender Equality and Equal Opportunities was illustrated as this level, although, may not have been explicitly recognised as such.

4.6.4 Equalities and multiple needs

Provider project staff also noted that they found addressing barriers to employment in relation to diversity characteristics is secondary to addressing auxiliary barriers such as low qualification and skill levels, housing and debt problems, anxiety and depression and low confidence and self esteem. These barriers were ones which participants needed to address before entering employment. This was a further reason why building and sustaining links to other services and organisations was seen to be important, so that providers could refer participants to external services that could better address these auxiliary barriers and provide longer-term support. Whilst these multiple needs were not discussed as relating to specific characteristics such as age or gender, it is important to note that specific needs (such as housing needs) do differ depending on individuals' characteristics and circumstances. Therefore addressing auxiliary needs could require the incorporation of thinking around Gender Equality and Equal Opportunities to ensure adequate provision was in place.

4.6.5 Flexibility of ESF service design

Flexibility in service design and the diversification of offers of support were key to helping participants with changing needs and circumstances and providers were increasingly assisting participants to explore new career choices such as self-employment and sector change. Providers had diversified support to include help around self-employment, which was seen as a suitable solution to the problems such as fewer vacancies in the labour market or employer prejudices around employing particular groups such as those with criminal records. In addition, self-employment often suited participants' schedules better, allowing more control

over working hours. For example, one participant was given support and guidance to become a self-employed beauty therapist and was able to fit appointments around her caring responsibilities.

Where participants lacked relevant work experience, employability or work specific skills, Provider project staff used more creative approaches to finding relevant skills such as exploring participants' hobbies in detail. This was because participants' hobbies often involved transferable skills, or were seen as good starting points for exploring possible career options. One example given was a participant who enjoyed fixing up cars in his spare time and for whom exploring a career as a mechanic was suggested.

ESF providers were confident about the quality of provision which they felt was facilitated by having highly trained staff. Providers were praised for providing the opportunity to offer flexible, creative, one-to-one and holistic support to participants. However, concerns were raised by Provider project staff that increasing reliance on prime contractors could reduce capacity for this. Niche contractors were concerned that they would have to follow a 'one size fits all' model imposed by the prime contractor if they were to continue to be funded, and lose the current flexibility regarding the nature of the support they provided to participants, which provided the opportunity to engage diverse groups.

ESF providers demonstrated their responsiveness to the limitations of current labour market conditions through flexible, apt and timely changes in the service they offered, such as new focuses on self-employment and flexible working options. In developing new areas of support, ESF providers concurrently helped to open up possibilities, particularly for female participants, for fitting work around other responsibilities, thus mainstreaming Gender Equality and Equal Opportunities in new areas of service provision. Providers were instrumental in helping participants to acquire the skills and experience in new areas of work.

4.6.6   Flexibility of ESF delivery

The flexibility of ESF-funded provision, in terms of the way support was designed and delivered to meet the needs of a diverse range of participants was cited as a key way of ensuring effective service provision for participants. Depending on the support needs of individual participants, one-to-one support ranged from help in job search and regular work-focused sessions with case workers to intensive help, accompanying participants to appointments with other services and job interviews. Mentors, who were often recruited amongst participants who had entered employment since previously accessing ESF services themselves, were also used to help participants. Having been in similar situations themselves, these mentors were seen as important sources of support that current participants could identify with and were used to support younger and older participants and those changing careers or sectors.

Provider workers and participants reported that it was important to provide support and training opportunities that participants could fit around their own

schedules. Furthermore, they tried to meet or arrange venues that were easy to reach for participants and in which participants felt comfortable or arrange remote learning where appropriate, for participants such as those with disabilities or Muslim women. For example, staff could meet participants in a café in town because this was easier for them to get to and because they felt more at ease there. In addition to flexibility in timings and locations for meeting, participants appreciated having a choice in the way their courses were structured.

The mainstreaming of Equal Opportunities is evidenced in providers' efforts to provide a flexible service to its participants, to personalise levels of support according to participants' individual needs and to address multiple and auxiliary barriers to employment. However, limitations in time and resources may present ESF-funded providers with challenges in adopting wholly personalised and flexible approaches to delivering support to all participants, particularly those in most need of support.

Summary – Good practice and ways of working

The keys ways in which ESF-funded providers had been working to promote Gender Equality and Equal Opportunities was through the design and delivery by providers to encompass:

- 'active' employer engagement in which providers built sustainable relationships with employers, facilitated the creation of job or work placement opportunities, challenged negative employer perceptions of different participant groups, and provided guidance and support around necessary adjustments;

- 'active' outreach to participant groups and building links with associated community and voluntary sector organisations. These were valued not only for reaching out to new and diverse participant groups but also in acquiring good practice in meeting their needs;

- support in addressing auxiliary and multiple barriers to employment such as poor basic skills, housing problems or substance misuse issues before addressing equalities related characteristics but whilst incorporating thinking about Gender Equality and Equal Opportunities to ensure adequate provision was in place;

- flexibility in terms of service design in which providers made apt and timely changes in service offer, such as support around self-employment and flexible working options, in response to changing labour market conditions and individual participant needs;

- flexibility in the delivery of ESF-funded provision, in terms of the level of intensive support, flexibility in timings, location and structure of training and support, tailored to meet diverse participant needs and circumstances.

Although the findings above demonstrate the ways in which Gender Equality and Equal Opportunities were being promoted by the 'ways of working' ESF providers can adopt, the extent to which providers were able to promote this varied and depended on the target group or specialist Gender Equality and Equal Opportunities knowledge they had.

Another limitation in promoting Gender Equality and Equal Opportunities was inadequate dissemination of good practice. Good practice in promoting Equal Opportunities was disseminated and shared between providers through CFO and ESF Works websites, through regional networks and at events set up for the sharing of success stories. However, gaps in communication between organisations as well as between management and staff working on the ground were seen to be barriers to the promotion of Gender Equality and Equal Opportunities and were viewed as an area for improvement.

5 Progress towards implementing the Mainstreaming Plan

In the introduction, key aims of the Mainstreaming Plan were outlined. In the final, concluding chapter of the evaluation report these are revisited to explicitly explore progress and identify areas that may require further development, with regard to mainstreaming Gender Equality and Equal Opportunities within the European Social Fund (ESF) programme.

The aim of the Mainstreaming Plan is to ensure that Gender Equality and Equal Opportunities are properly integrated into the planning, delivery, monitoring and evaluation of the ESF programme. The evaluation has found that generally these are integrated into the programme and the nature of the organisations that procure and provide ESF provision leads to Gender Equality and Equal Opportunities being embedded into the process. The procurement process is particularly valuable for ensuring Gender Equality and Equal Opportunities is integral to planning and delivery. Planning how Gender Equality and Equal Opportunities will be promoted at the procurement stage embeds this into the programme and ensures that Gender Equality and Equal Opportunities have a high profile from the outset. The inclusion of questions about Gender Equality and Equal Opportunities in the procurement process and the subsequent monitoring and review of performance of these issues helped to keep them in the mind of providers and embed them in their day-to-day activities. A focus on Gender Equality and Equal Opportunities as part of the procurement process also encouraged specialist providers to apply for funding to address barriers in relation to training for specific disadvantaged groups. This would appear to reflect the aims of the Mainstreaming Plan in terms of integrating Gender Equality and Equal Opportunities into the planning, delivery and monitoring of the ESF programme, and supporting the development of specialist activities, as a part of the 'dual approach'. Thus, at policy level, mainstreaming appears to be operating well.

However, at the level of delivery there appears to be confusion regarding the extent to which Gender Equality and Equal Opportunities should be promoted within the programme as well being an aspect of the outcome of the programme. For example, whilst Co-financing Organisation (CFO) Contract Managers (CMs) could be aware of policies that providers had to follow to promote Gender Equality and Equal Opportunities, they could be less familiar with Gender Equality and Equal Opportunities policies operating within their own organisations, internally, and the implications these policies had for their work.

Monitoring of Gender Equality and Equal Opportunities was also felt to be an integral aspect of providers' and CMs' day-to-day work. However, there was again confusion as to whether this referred only to monitoring the characteristics of participants or also that of the programme staff in order to ensure balanced participation. The fact that diversity targets are viewed as aspirational and not linked to payments could limit the ability CMs have to prioritise them as project outcomes. Finally Provider project staff suggested that they would appreciate having a greater understanding of the uses to which the monitoring data is put.

Another aim of the Mainstreaming Plan is to support the dual approach to mainstreaming. As noted above, the qualitative Case Studies evidenced that the dual approach is integrated into the current programme. Niche provider organisations clearly provided specialist support to participants, and Gender Equality and Equal Opportunities were taken into account in the delivery of mainstream provision. The procurement and contract management process again particularly supported this.

However, there was also limited awareness of the dual approach and this concept could benefit from further dissemination. Niche providers who were familiar with the concept reported concerns that the increase in large contracts to prime contractors could lead to their specialisms becoming subsumed into one overarching model, mirroring that of existing mainstream provision. This was viewed as highly detrimental to the dual approach and niche provider organisation staff recommended that small contracts should continue to be awarded directly to specialists and not via subcontracts with prime contractors.

A further aim of mainstreaming Gender Equality and Equal Opportunities is to ensure that the equality targets set out in the Operational Programme are achieved. Results from the Management Information (MI) data and Cohort Survey indicate similar results in most categories and progress is being made. For example, targets are being achieved in relation to disability in Priorities One and Four, and ethnic minority targets are being achieved in Priority Five. The targets are close to being met for engaging ethnic minority participants in Priority One. Engaging participants over 50 has met the target if referring to the Cohort Survey but not yet in the MI data, although the figures for over 50s in Priorities One and Four are close to the target. However, more work is yet to be done. Gender figures

are particularly low in Priority One in comparison to the targets set. The Case Study interviews indicated that Provider project staff find the gender target rather unrealistic, especially given the current economic situation with traditional male industries being particularly affected. Good work is being done to engage ethnic minority groups but this appears to be patchy at the moment and more may need to be done to encourage this and also to ensure ethnic minority groups are aware of ESF and what it can offer them.

In particular the evaluation has found an ethos of 'working with whoever needs the service'. This is undoubtedly well meaning, but may indicate a lack of understanding regarding the nature of discrimination and inequality for certain groups, by Provider project staff. Especially when overall performance is good this could also reduce the motivation to engage the most excluded groups via active outreach (although such outreach was also occurring). Successful targeting of particular groups may be necessary and an awareness from staff of why this engagement is important to promote access to different groups to ESF, and not just a 'paper exercise' to meet their targets, would be useful. Examples of successful targeting have been provided in this report and include posters in different languages, drop-in sessions in community centres frequented by different groups, a presence at community events, and having staff involved in provider organisations with specialist knowledge of certain groups.

The Mainstreaming Plan also aims to ensure that a sustained and pro-active approach to promoting gender equality and equal opportunities is maintained, the theme is highly 'visible' throughout the programme and that all stakeholders involved in the programme consider how they might improve upon the way they integrate equal opportunities by sharing and disseminating new ideas and good practice. Gender Equality and Equal Opportunities does enjoy a reasonably high level of visibility throughout the programme, and is particularly promoted as a cross-cutting theme. The training provided by ECOTEC was another driver that had promoted knowledge and understanding of Gender Equality and Equal Opportunities and was praised for being high quality. However, there was also variation in the extent to which CMs felt Gender Equality and Equal Opportunities could be and should be an integral aspect of their role and confusion reported post-training as to whether their role regarding the promotion of Gender Equality and Equal Opportunities may now change. There was also some resistance to the idea that CMs should be charged with the promotion of Gender Equality and Equal Opportunities, especially from those who were less well versed in equalities, given the number of contracts that they manage and sense that overall performance in terms of outcome may take precedence. This also indicates that CMs' roles could be further clarified and their responsibility for promoting the mainstreaming of Gender Equality and Equal Opportunities should have a clear benchmark (which may differ between roles or CFO). The variation in awareness of knowledge and understanding of mainstreaming from CM and Provider project staff could lead to difficulty conceptualising what mainstreaming of Gender Equality and Equal Opportunities means, and the implications it has for their work. This indicates

that for some, mainstreaming is less advanced, than for others. There was also concern that more needed to be done to raise awareness of Gender Equality and Equal Opportunities among participants, with operational Provider project staff reporting that they had to intervene during training to prevent racist, homophobic or transphobic comments being made during training sessions.

With regard to sharing good practice, this was actively promoted between providers by facilitating networking events. These could be at the inception phase, or explicitly be set up by CMs to support provider organisations to make contact with other providers that are working well with certain groups within a given locale. There was less clarity regarding the value of existing sources of information such as Equal Works, however. Whilst this does provide a great deal of information regarding good practice and the promotion of Gender Equality and Equal Opportunities, CM and Provider project staff were not always particularly familiar with the content or site. Further dissemination of clear examples of good practice regarding ways of promoting Gender Equality and Equal Opportunities could be developed (with examples provided within this evaluation report).

Finally, the Mainstreaming Plan aims to ensure all partners involved in delivering ESF actively promote equality in line with their public duties under equalities legislation. This was found to be occurring, as explored in Chapter 2. The nature of the organisations involved in the ESF programme led to the promotion of Gender Equality and Equal Opportunities, and adherence to statutory duties to be integral and high priority components of their work. This was beginning to extend to implementing measures to ensure that duties under the forthcoming Equality Act 2010 will be met. Indeed it was the case that provider and CFO staff reported to be further advanced regarding Gender Equality and Equal Opportunities as set out in the Mainstreaming Plan, and it instead provided a benchmark of minimum standards, than an 'ideal' they were yet to achieve.

Overall, the value of the Mainstreaming Plan was seen in a number of ways. At a strategic level it was thought to make a public statement of commitment to the promotion of Gender Equality and Equal Opportunities within ESF-funded services. To this extent it also made Gender Equality and Equal Opportunities a policy priority, making it a specific focus of attention and reinforcing the message to CMs and providers about their importance. Finally, the plan also helped to promote a 'mindset' around Gender Equality and Equal Opportunities, underlining that they must be central to all of the practices of CFOs and providers and not be treated as an 'add on' to other activities. However, further clarity regarding roles and responsibilities of staff to promote Gender Equality and Equal Opportunities could be useful.

Participants interviewed for the Case Studies also particularly valued the focus on Gender Equality and Equal Opportunities in provision. For example, an older participant felt that he had been given the opportunity to become self-employed despite his age, while a female participant said she welcomed the emphasis on having a mix of participants from different backgrounds on her training course and financial support for childcare.

5.1   Conclusion

Where mainstreaming was felt to be well advanced this was thought to stem from the fact that the promotion of Gender Equality and Equal Opportunities was already high on the agenda of the organisation involved. This was particularly seen in senior management commitment to the policy, existing use of Equality Impact Assessments (EIAs), detailed documentation of Gender Equality and Equal Opportunities policies and practices, and having particular staff or committees to champion these policies. CMs and strategic stakeholders also thought that mainstreaming was well advanced if providers had an existing commitment to Gender Equality and Equal Opportunities demonstrated through the ethos or purpose of the organisation. The main ways in which ESF was thought to have directly influenced the promotion of Gender Equality and Equal Opportunities was through the procurement and monitoring processes.

However, mainstreaming could also be described as a work 'in progress', emphasising areas where achievements had been made, and where there was still work to be done. Achievements were seen in terms of mainstreaming offering a benchmark to aim for and in the view that the procurement and equal opportunities monitoring processes could no longer be seen as 'tick box exercises' but as ways of ensuring that specific Gender Equality and Equal Opportunities policies and practices would be put in place against which providers could be assessed. Work that still needed to be done in order to make mainstreaming more effective involved: further clarification from ESF Division DWP (ESFD) of what specific work is to be undertaken by CMs and providers to promote Gender Equality and Equal Opportunities, including whether this involves staffing practice as well as service delivery; the need for more effective and consistent measures of progress in relation the promotion of Gender Equality and Equal Opportunities – including what would be considered a minimum standard in relation to various policies and practices – in order to avoid CMs and providers misunderstanding the implications of what the responsibility to promote Gender Equality and Equal Opportunities entails.

Appendix A
Equal Opportunities Mainstreaming – chronological overview

1999

The European Social Fund (ESF) Operation Programme (2000-2006) explains the new mainstreaming approach that the programme would adopt for equal opportunities. It confirms that a mainstreaming action plan will be developed for the programme.

The Department For Education and Employment (DfEE) had produced some basic guidance on mainstreaming during 1999. Mainstreaming was a relatively new concept in 1999 and we had no experience of mainstreaming in practice. This meant that we faced a very steep learning curve (as did our partners involved in helping us develop this approach). The upshot of this was that progress in developing and agreeing a strategy that could be translated into operational activities slower than we would have liked.

2000

A working group was set up in April 2000. It was an informal group and was a fore-runner to the formal Equal Opportunities Sub Group which formed in 2001.

The group had the idea of devising a Mainstreaming Plan which would set out a framework for mainstreaming equality across the GB countries – the Community Support Framework (CSF) level. The plan was also meant to act as a template for Objective 1 and 2 regions as well as the Objective 3 regional committees who would need to produce their own regional Mainstreaming Plans in future. The

approach to all of this was developmental and not mandatory. We were sensitive to devolution issues at the time and also devolving out of power form the centre in England – promoting regional/local decision making.

The first draft Mainstreaming Plan was discussed in a working group meeting on 12 April 2000. It was subsequently revised in April 2000. It describes the CSF's holistic commitment to promoting equality – but the main focus is on the English OP. The focus, is on:

• monitoring committees promoting equality;

• regional development plans; and

• application processes promoting equality.

A revised version of the plan was drafted in June 2000.

In August 2000, the working group set up a meeting to consider promoting an equal opportunities checklist for provider selection panels. This was very ambitious at the time and was considered impractical given the lack of staff development/ capacity building at the time.

2001

The Equal Opportunities Sub Group, which reported to the Equality Monitoring Committee and English and GB Monitoring Committees, was formally established in 2001. Its first meeting was held on 10 May.

A revised version of the English equal opportunities Mainstreaming Plan was presented to the Equal Opportunities Sub Group on the 18 September 2001.

A draft version of a reporting template to be issued to the English regions was discussed and the Sub Committee asked for the template to be revised so that it reflected the Mainstreaming Plan more closely. The reporting templates were to be issued to the English regions later in the year and when they had been completed and returned to ESFD, a national progress report would be compiled to show what progress was being made to mainstream equal opportunities in the regions.

The reporting template asked regions to report on their progress by describing issues such as:

• commitment to equal opportunities at regional monitoring committee level, access to expertise, etc;

• development of regional equal opportunities strategies; and

• equal opportunities and provider scoring.

The English regions returned their templates in November 2001 and the results were analysed and used to inform the progress report and update the Mainstreaming Plan. The progress report was designed to provide a snapshot of progress which could be explained to the national monitoring committee as well as the sub group.

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The main conclusion in 2001 was that although there was high level commitment to equal opportunities, the development of regional strategies were very much in the early stages.

RDP Guidance was issued in April and June 2001 – which attempted to tighten up the strategic approach of the RDPs – which were considered to be too general. They needed a sharper focus if they were to seriously act as strategic documents informing the selection process. Horizontal themes of equality and sustainable development were incorporated into the June guidance.

A national equal opportunities workshop was held in Sheffield on 19-21 July which aimed to look at issues like the Mainstreaming Plan, reporting template, and equal opportunities criteria for provider selection. This was a large meeting involving a wide range of Government Office (GO) representatives.

A further revised Mainstreaming Plan was produced in September 2001 following the equal opportunities group meeting on 18 September.

The England monitoring committee was informed of developments resulting form the July workshop.

2002

The national progress report was produced in February 2002 and discussed at the third meeting of the Equal Opportunities Sub Group on 13 February – along with the national Mainstreaming Plan which had been revised again in January 2002.

The England OP Monitoring Committee agreed the amended Mainstreaming Plan at its meeting on 12 March 2002. They also discussed the key results from the national progress report following a presentation.

A national workshop was held on the 27-28 June in Sheffield which looked at new proposals for equality selection criteria – possibly using an equality gateway approach for direct bid providers and also considered how CFOs could use such criteria. Workshops were run to try to test criteria using 'dummy' provider applications.

Criteria for 'direct bid' gateway were tested in North East in September 2002.

The terms of reference for the Equal Opportunities Sub Group were amended at the sub group meeting of 1 October 2002 to include reference to the EQUAL programme. Proposals for a progress report/template were accepted for following year.

The near final version of gateway guidance was produced in 31 October 2002 (for direct bid applicants).

2003

The LSC and Jobcentre Plus gave presentations on equality criteria and procurement arrangements to the sub group which agreed that standards adopted by LSC and DWP were at least as acceptable as gateway criteria for direct bids. The sub group asked for this to be communicated to the national monitoring committee.

LSC and Jobcentre Plus standards for selection incorporated into consolidated guidance in March/April 2003.

Some emerging results from the formal mid-term evaluation of equal opportunities became available in March 2003 – these would eventually be published in the main MTE report which was sent to the European Commission in December 2003.

Results from the national template progress report were presented to the national monitoring committee on 1 April 2002 along with confirmation about LSC and Jobcentre Plus equality criteria standards being at least as good as gateway criteria devised for direct bid applicants.

A consultant was appointed by ESFD to deliver training for GO/regional staff who would be using gateway and setting targets for their regional mainstreaming strategies.

The Mainstreaming Plan was revised in October following results from the national progress report. Key revisions to the plan were for regions to begin developing regional mainstreaming strategies and for the strategies to refer to CFO gateway development.

The MTE report was sent to the Commission in December 2003.

2004

The Equal Opportunities Sub Group met on 5 February to discuss the implications of the mid-term evaluation for the mainstreaming strategy. The upshot was that ESFD agreed to send strategic guidance to GOs and would incorporate equality issues in this strategic guidance.

ESFD decided not to prepare a national progress report during 2005 – given that the NMTE results would be published (so a further progress report would be 'overkill').

Strategic guidance following the mid-term evaluation was issued to the GOs in April 2002 – this included issues on equal opportunities mainstreaming.

By June 2004, gateway and target setting training had been delivered to all regions. Guidance on equal opportunities reviews with CFOs had also been produced (this was framework guidance and not prescriptive).

In October 2004 RDP guidance was issued to GOs setting out what they needed to do to update their RDPs in a way which was consistent with the revised OP following the mid-term review. This guidance included reference to equal opportunities issues as well. Revised RDPs were checked by ESFD.

The equal opportunities sub group met again on 15 October and agreed proposals for a new equal opportunities progress report for 2005 and also to revise the Mainstreaming Plan in light of the mid-term evaluation.

The Mainstreaming Plan was revised in November 2004.

2005

The national progress report for 2005 was discussed at the equal opportunities sub group meeting of 28 February.

A summary of achievements of the sub group and the mainstreaming process was presented to the national monitoring committee in November 2005 along with proposals for the sub group to change its focus away from processes now that the programme was approaching an advanced stage. The new focus of the sub group would be on identifying and sharing good practice.

2006

The terms of reference for the Equal Opportunities Sub Group were amended in February 2006 to reflect its new focus in terms of identifying good practice between EQUAL and Objective 3 programmes and identifying lessons learned and good practice which can inform the new programme.

The sub group agreed that a simplified and more strategic template should be issued to the GO regions for the progress report for 2006.

The Mainstreaming Plan was revised to reflect this new focus.

The national progress report was compiled in June.

An update on progress was given at the July monitoring committee meeting.

The sub group set up a working group to explore good practice further. This group met in October 2006 and reported back to the national monitoring committee on good practice identified, via written procedure, in December 2006.

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Appendix B
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Contextual literature review

NatCen

January 2010

Contents

Introduction

The European Social Fund (ESF) in England provides EU funds through the Department for Work and Pensions (DWP) for the provision of services that assist with skills, employability and economic development across nine regions (including Gibraltar). These funds are procured and contract managed via regional Co-financing Organisations (CFOs), namely DWP, the Learning and Skills Council (LSC) and regional development agencies (RDAs) or Government Offices (GOs). The services are provided through specialist and mainstream employment and education agencies in local areas. The ESF Managing Authority implemented a Gender Equality and (Gender Equality) and Equal Opportunities Mainstreaming Plan to promote gender equality and equal opportunities as cross-cutting themes of the 2007-2013 ESF programme and to ensure public body duties to promote equality are met. The second cross-cutting theme is Sustainability.

Political attention to gender equality and equal opportunities in the UK is coming into sharp focus with the advent of the Single Equality Act due to come into full effect by 2011. Equality legislation will be brought together under a single act, providing protection to all citizens from discrimination due to age, gender, race, ethnicity, sexual orientation, disability or religion, when accessing employment, public services and education. The Single Equality Act is also expected to increase public sector duties to promote and protect equality and to address socio-economic inequalities and multiple forms of discrimination. In addition, Article 13 of the Amsterdam Treaty (1998) has already empowered the EU to take action to deal with discrimination on a range of grounds including ethnicity, sexual orientation, faith and disability.

The ESF Gender Equality and Equal Opportunities Mainstreaming Plan addresses a number of duties pertaining to EU and UK legislation, and acts as a driver to ensure that employment and educational inequality on the basis of group characteristics continues to be explicitly addressed within ESF provision. This is alongside the ongoing work of partners that implement ESF funds, such as DWP, LSC, local authorities and RDAs, to ensure Gender Equality and Equal Opportunities duties are met.

This review explores a number of issues relating to gender equality and equal opportunities and employment, and aims to provide the context for understanding ESF provision and the ESF Gender Equality and Equal Opportunities Mainstreaming Plan. The review has three sections: In the first section, theoretical perspectives regarding gender equality and equal opportunities, and the means by which they can be promoted, are briefly outlined and the current legislation relating to equalities is discussed (including EU legislation). It is noted that enduring patterns of employment-based inequality (such as the gender pay gap) continue to persist (Tomei, 2003). In the second section, using existing literature, barriers to employment that may affect different groups and means by which discriminatory barriers may be overcome, are identified. In the third section, ESF provision and how the Gender Equality and Equal Opportunities Mainstreaming Plan is being implemented are outlined. The intention of this literature review is to set the context for the evaluation of gender equality and equal opportunity within ESF that is currently being conducted. This review is a companion document introducing key concepts and themes.

Section 1: Theories of equality, employment and the legislative context

The significance of Gender Equality and Equal Opportunities cannot be fully understood without the theoretical context and history of equality legislation first being briefly outlined. Despite equality being held as a social 'good', it is also a complex and multifaceted concept without a single understanding or meaning. In this section types of justice and equality are conceptualised and the history of equal opportunities and diversity management in the UK briefly noted. Gender equality mainstreaming is presented as a particular case, illustrating some of the challenges and benefits of the approach.

1.1   Types of justice and equality

Tomei (2003) identified three strategies that underpin the promotion of equality at work (from McCrudden, 2002) – individual equality, social justice, and, diversity management. Each is summarised below.

Individual equality refers to the same procedures and processes being applied to all. Therefore it is deemed that everyone has an equal chance to succeed by being treated the same. This approach has been criticised for not taking into account differences between groups and different needs that individuals may have in order to be able to attain the same outcomes. It has also been criticised for the reliance on the notion of 'merit' to assess rewards such as pay and promotion because merit is widely critiqued as being a socially constructed concept, rather than consisting of an objective set of skills and attributes. For example, research by Roberts *et al.* (2008), discussed in Section 2, argued that criteria underpinning the distribution of opportunities, such as the 'right' way to speak and act during an interview, are usually decided and constructed by the dominant group, thus inadvertently acting to discriminate against those from outside this group who may act in a different manner. The rejection of 'outsiders' (often 'minorities') can then be justified as being due to their lack of 'merit'.

Social Justice refers to a parity of outcome and result being sought. This approach tends to use statistics to evidence unequal patterns between groups. When groups have an equality of outcome (the same number of women being employed in a profession as men, for example), this is viewed as a marker of equality being achieved. However, this approach may not take into proper account the socially situated nature of individuals' lives and the different needs or interests they may have. The capabilities approach based on a human rights framework can therefore be usefully evoked here (Sen, 1993; 1999). Pioneered by Sen, a capabilities-driven approach to equality highlights the importance of individual actions and will. It is not what people do, but what they are capable of doing that is critical to assessing levels of equality in the capabilities approach. Thus, equality of opportunity is held as the key marker of equality. Not all people will activate the same opportunities – but all should have the capability to do so. A capabilities-based approach to equality has been taken up by some academics in the equality and diversity

management field, such as Gagnon and Cornelius (2000), who suggest that it may have some practical purchase for organisational policy makers. Indeed, it has been widely adopted and underpins the measurement of equality recommended to the Equalities Review Steering Group (Vizard and Burchardt, 2007).

The third typology Tomei identifies in some ways parallels the capabilities approach. Diversity management asserts the need to take into account individual differences and ensure inclusion of all, without the need for assimilation. Highlighting diversity requires systems and processes that provide equality of access, but also allow for differences between individuals and groups to be incorporated. Systems and access to opportunities therefore have to be designed to be sensitive to the needs of different groups. Criticisms of this approach note, however, that this still implies assumed group characteristics – for example, that all members of a certain ethnic or age group share similar aspirations and needs. Further, the concept of diversity can have multiple meanings, each of which have specific implications for policy making.

However it is diversity management that is currently at the forefront of equality work in the UK (Kirton and Greene, 2009). Kirton *et al.* (2007) found in their research with diversity management professionals that this position (Diversity professional) tended to have higher status than that of Equal Opportunity professionals that came before them. Further, diversity managers tended to have a professional background in business or management. This, it is argued, indicates that the equalities agenda, in the guise of diversity management, may be becoming increasingly embedded in employment providers' structures, and enjoy a higher status and priority than the equal opportunity management that came before. Equal opportunities were about treating all people equally (the same), whilst diversity management aims for a diverse workforce with their different needs incorporated (Kirton *et al.*, 2007).

Kirton and Greene (2009) also note, however, that the two – equality and diversity – are part of the same continuum, intertwined rather than distinct. Within a context of burgeoning equalities legislation, diversity management may be the next phase of equal opportunities work, rather than a distinctly different approach, and indeed both have similar elements. However, diversity management approaches have tended to fit within the paradigm of the business case for equality, as opposed to the social justice, rights-based discourse of equal opportunities that informs the ESF Mainstreaming Plan (see Section 3).

1.2 The business case for equality

Riley *et al.* (2007) investigated the business case for equal opportunities using the Workplace Employment Relations Survey data. Specifically, they examined whether Equal Opportunities policies and practice affect business performance, and especially if this then has a bearing on productivity or profit. Making a business case for equality is complex, however, and the issue of causality is difficult to prove. Just because an organisation has a developed set of Equal Opportunities policies

and operationalises these in practice, the performance of that organisation may have no causal link to Equal Opportunities practice. Implementing policies can lead to costs as well as benefits, and the same initiatives may not have the same effect when implemented in two different business contexts or industries. Riley *et al.* (2007) found that essentially, whilst equal opportunity policies do not have to be costly or difficult to implement, they do not necessarily lead to an improvement in performance measured by productivity or profit. However, they noted that there was limited data from which to conduct the analysis and that examples of good equal opportunity policies, such as family friendly, flexible working arrangements, did appear to have a relationship with improved performance. There can be secondary outcomes from adopting strong equal opportunity policies and practices, such as improved staff morale or positive image for the company, which have an indirect impact on organisational performance. The difficulties in establishing the relationship between performance and equality and diversity policies is not confined to the UK experience. The US literature contains a number of studies that have attempted to measure the contribution of workforce diversity and diversity management initiatives to organisational success (e.g. Ng and Tung, 1998; Gilbert and Ivancevich, 2000; Wheeler, 2003). However, even though these studies call for 'hard measures', they have not really managed to answer the question of exactly how to isolate the effects of other variables (such as the state of the economy or falling/rising demand for particular products and services) and the tools to do so remain elusive (Greene and Kirton, 2009).

Riley *et al.* (2007) noted that for equal opportunity practices to be implemented well requires monitoring, and regulation of these practices. Training to ensure that staff have the skills to implement policies into practice is also key. Finally, equality policies and the practices recommended to implement them need to be subject to some form of within-organisation enforcement or sanctions to ensure they are adhered to.

A means to ensure the integration of equal opportunity practices has, in recent years, taken on resonance via the concept of mainstreaming equality.

1.3 The case of gender mainstreaming

It is in the area of gender equality where the term 'mainstreaming' has become most widely used by policy makers and equality practitioners. Gender mainstreaming is now an accepted strategy for promoting gender equality, but the literature theorising mainstreaming is still in its infancy (Booth and Bennett, 2002). Mainstreaming is not the end in itself, but can be seen as a strategy with the aim of achieving gender equality (Miller, 2009), or as a delivery approach consisting of tools and methods (Rees, 1996). Indeed Booth and Bennett argue (2002) that these dual roles of gender mainstreaming have led to conceptual confusion over what it means and it should be acknowledged as an action that is about both strategy, and tools and methods, if it is to be implemented successfully.

Gender mainstreaming involves ensuring that gendered perspectives and attention to the goal of equality, are central to all activities within an organisation or programme – policy development, research, legislation, resource allocation, and the planning, implementation and monitoring of programmes and providers. Gender mainstreaming as a strategy first appeared after the UN Third World Conference on Women in Nairobi in 1985 (Council of Europe, 1998) and was subsequently the policy adopted by the EU *'to promote equality between men and women in all activities and policies at all levels'* (COM (96) final, in Booth and Bennett, 2002). Unlike previous European strategies advancing equality, which have arisen after pressure from social movements, the mainstreaming strategy has been *'envisioned and articulated'* by *'key actors within the European Commission'* (Booth and Bennett, 2002: 440).

In a useful outline of the development of gender mainstreaming in EU policy, Booth and Bennett (2002) argue that gender mainstreaming is reliant on three perspectives and each one is interdependent. These three perspectives are that of: equal treatment (women being guaranteed the same rights as men); the women's perspective (recognition that women are disadvantaged and may have specific needs); and, the gender perspective (acknowledging difference between men and women and the role both play to *'transform the organisation of society to a fairer distribution of responsibility'* (2002:434). Booth and Bennett argue (2002) that gender mainstreaming emerges at the centre of these three perspectives and its successful implementation as a strategy relies on the acknowledgement that each perspective has a role to play in addressing gender inequality.

The same could be said for mainstreaming equal opportunity per se, with mainstreaming as both a strategy and method resting on three principles of equality – the right to equal treatment; the acknowledgment of the specific needs individuals and groups have; and the promotion of the role and responsibility everyone has to promote equality.

So the EU has a commitment to raise levels of employment amongst women and to promote gender mainstreaming and gender equality in employment and social inclusion policy, which is manifest in the Treaty of Amsterdam (1998). Gender mainstreaming has so far been at the forefront of equality mainstreaming within the EU and the subject of an albeit fairly limited range of academic scrutiny. However, as this literature highlights, the process of mainstreaming equality is not without challenges or critique.

For example, based upon an investigation of 20 companies claiming best practice in external communications on gender reporting, Grosser and Moon (2006) found that whilst there is widespread reporting of gender/diversity policies and programmes, reporting of gender impacts and performance continues to be low. Following an examination of strategies implemented to narrow the gender pay gap, Eveline and Todd (2009) concluded gender mainstreaming is dependent upon political will, strong links between research and action, and adequate resources to implement practices that promote gender equality. Due to the difficulty in

achieving this synthesis Eveline and Todd note that gender mainstreaming is rarely delivered in practice. It is unclear whether the same synthesis of political will, research into action, and resources are the necessary ingredients for the successful mainstreaming of all equalities strands.

In a more critical paper, Fagan *et al.* (2005) argue that gender mainstreaming within EU member states is patchy and narrowly focused. Following enlargement and as a result of greater diversity across member states and ongoing EU reform, gender mainstreaming faces many challenges. Thus, different countries may be more or less advanced in their attempts to mainstream gender equality and the challenges that they face to do so differ. These challenges can also be related to external pressures – for example, the political will to mainstream gender equality may be present, but economic or social factors specific to the region or country can act to counter this will. With this point in mind, Barnes *et al.* (2005) examined the fit between policy developments regarding gender inequality in the sphere of employment at regional and national levels. They concluded that whilst the effectiveness of sub-regional policy – in relation to gender equality – may be limited in its inability to adequately respond to additional structural issues (such as the labour market), it can play a role in tackling gender inequality in employment and can help to introduce a gender perspective to measures that promote local economic development (Barnes et al, 2005). Therefore, whilst it may appear that a number of factors outwith the equalities agenda can act to inhibit moves to mainstream equality, such as the employment market, it is the act of mainstreaming that creates the contexts whereby future developments, currently not deemed within the remit of equalities, will become so – *'mainstreaming is a strategy addressing a future, which is not yet upon us'* (Booth and Bennett, 2002: 442).

The challenges and problems of implementing mainstreaming need to be thought through and acknowledged. What these challenges and problems are will be dependent on local contexts and the histories of struggles for equality within these contexts (Rubery, 2002).

However, based on the available evidence and argument, it could be asserted, the mainstreaming of gender equality and equal opportunities within ESF requires a synthesis of policy development, research, legislation, resource allocation, and planning, implementation and monitoring of programmes completed in a manner that incorporates the perspectives of different groups and allows for equality to be engendered throughout. It also requires a dual approach, incorporated into all activities, alongside specific measures to address the needs of disadvantaged groups.

Also important to note is that progress may already have been made in the UK context to mainstream equalities both due to existing legislation and procurement processes for agencies that hold contracts with public bodies. However, mainstreaming is an explicit strategy requiring a set of methods to implement successfully. Within the current ESF Programme this strategy is represented by the Mainstreaming Plan and incorporation of Gender Equality and Equal Opportunities

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as a cross-cutting theme. In section three the ESF Gender Equality and Equal Opportunities Mainstreaming Plan is outlined.

1.4 Legislation and public duty

Arguably the single most significant driver of equality is legislation. The origins of equality law can be traced to the post-war period during which a consensus emerged on the principles of non-discrimination (McLaughlin, 2007:111). UK equality law further expanded with the addition of seven UK acts and two EU directives. These acts resulted in the expansion of existing anti-discrimination legislation, a new enforcement authority and the introduction of 'positive equality duties' (i.e. enshrining the belief that is it not enough to address discrimination when it occurs, but also to promote practices that avoid discrimination occurring in the first instance). The introduction of positive equality duties represents the most fundamental change to UK equality law since the 1970s.

To summarise, the key UK legislation includes:

Equal Pay Act 1970;

Sex Discrimination Act 1975;

Race Relations Act 1976;

Disability Discrimination Act 1995;

Human Rights Act 1998;

Special Educational Needs and Disability Act 2001;

Employment Equality (Religion or Belief) Regulations 2003;

Employment Equality (Sexual Orientation) Regulations 2003;

Employment Equality (Age) Regulations 2006;

Equality Act 2006.

Race, disability and gender legislation have been subject to recent amendments, summarised below:

The race equality duty was introduced into legislation in the Race Relations (amendment) Act 2000. This means that public bodies must have 'due regard' to the need to:

• eliminate unlawful racial discrimination;

• promote equality of opportunity; and

• promote good relations between people of different racial groups.

Specific duties require all listed public bodies to publish a race equality scheme that identifies all functions/policies that are relevant to race equality.

The disability equality duty was introduced into legislation in the Disability Discrimination Act (amended 2005). This now means that public bodies must have 'due regard' to the need to:

• promote equality of opportunity between disabled persons and other persons;

• eliminate discrimination that is unlawful under the Act;

• eliminate harassment of disabled persons that is related to their disabilities;

• promote positive attitudes towards disabled persons;

• encourage participation by disabled persons in public life; and

• take steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons.

The gender equality duty was introduced into legislation in the Equality Act 2006, amending the Sex Discrimination Act. It means that public bodies must have 'due regard' to the need to:

• eliminate unlawful sex discrimination and harassment (including for transsexual people);

• promote equality of opportunity between men and women.

In addition, EU directives relating to the legislative duty of member states to protect citizens from discrimination and inequality include:

Equal Pay Directive 1975;

Equal Treatment Directive 1976;

Social Security Directive 1979;

Occupational Social Security Directive 1986;

Parental Leave Directive 1996;

Equal Treatment in Employment Directive 2002;

Goods and Services Directive 2004;

Recast Directive Equal Treatment in Employment and Occupation 2006.

In July 2008, the European Commission published Article 13 the Equal Treatment Directive, its proposal for an anti-discrimination directive covering goods and services on the four remaining grounds not already covered by EU law. This directive ensures equal treatment across the four strands of age, sexual orientation, religion or belief and disability, in the areas of social protection, including social security and health care; education; and access to and supply of goods and services which are commercially available to the public, including housing and transport, bringing these alongside gender and ethnicity in terms of protection from discrimination. This directive applies to both public authorities and private sector bodies providing goods and services and prohibits direct and indirect

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discrimination as well as harassment and victimisation. For people with disabilities, non-discrimination includes issues of accessibility as well as the principle of 'reasonable accommodation' being made to ensure such accessibility. Thus, in creating a more equitable legislative framework, the directive provided a minimal level of protection for citizens of member states should they face discriminative practices when within an EU member state. Article 13 resulted in new legislation and prompted a re-thinking within the UK on equalities legislation.

UK equality law then further expanded from the incorporation of race (1965, 1968, 1976), sex (1975) and disability (1995), as Article 13 required member states to protect their citizens from discrimination on the basis of not only sex, race and disability but also religion or belief, age and sexual orientation. In line with the proposed changes to EU law, the UK government introduced the Equality Act 2010 for Great Britain. If passed, this will bring disability, gender, ethnicity, faith or religion, age and sexual orientation within one piece of anti-discrimination legislation. The Equality Bill was published in April 2009. Royal Assent is expected in spring 2010, assuming the Bill is not lost through an early general election. The Government envisages that most of the Bill will come into force in Autumn 2010.

1.5   Equal Opportunity policies

Ensuring that companies and organisations hold relevant, good quality Equal Opportunity or Diversity Management Policies that are then translated into practice is a key indicator that they are maintaining their legislative duty to protect against discrimination. However, as Hoque and Noon (2004) argue, there can be scepticism that such policies are actually 'empty shells' and are not equated with practice. Hoque and Noon used data from the 1998 Workplace Employee Relations Survey (WERS) to identify the types of workplace that were more likely to adopt formal gender, ethnicity, age and disability policies. They then assessed if these policies were substantive or 'empty shells'-arguing that policies may indicate that equality is being rhetorically promoted, without an actual day-to-day mainstreaming of this or actionable progress being made on the ground. They assessed the policies by evaluating the extent to which workplaces with policies had also adopted supporting practices such as flexible working hours for carers, and the number of employees that have access to these supporting practices. They found that a significant proportion of workplaces with Equal Opportunity policies had not introduced the practices that might be expected from a good equal opportunity employer. For example, 16 per cent of workplaces with a gender policy did not adopt any of the eight gender-related Equal Opportunities practices asked about in the survey such as flexible working hours (Hoque and Noon, 2004: 489).

Ensuring that Equal Opportunities policies are monitored by a management body, information and targets relating to equality are maintained and that the policies are updated regularly are measures that can be taken to promote such policies. As Hoque and Noon (2004:498) argue *'Equal Opportunities policies and practice are unlikely to secure equal treatment on their own unless employers also develop an environment and culture that enables equality of opportunity to flourish'*.

The legislation sets the macro-level standards translated into the micro-level via policies, but it is ultimately the culture of organisations and the actions of individuals that translate policies into equality of opportunity being achieved by disadvantaged and marginalised groups. British law also allows for limited positive action where there is under-representation. This is the practice of taking special measures to promote accessibility to under-represented groups within certain employment sectors or organisations. However, in practice, positive action is currently unpopular, both due to legal challenges and changing beliefs regarding the value of such an approach to redress inequality.

1.6 Summary

In section one of this review a number of issues regarding Gender Equality and Equal Opportunities have been raised. The complexity of understanding what is being sought when equality is raised has been outlined and the (possibly false) distinction between equal opportunity and diversity management discussed. Arguments regarding the business case for equality and examples of gender mainstreaming have also been outlined. Finally, the current legislative context that drives the need for equality policies and practices to be in place within organisations in the UK was summarised. In the next section barriers to employment that different groups face – and the nature of support that can assist them to overcome these barriers – is focused upon.

Section 2: Exploring barriers to employment

In section two the focus sharpens into the aims of the ESF programme. The programme operates with two Priorities in England (with Priorities Four and Five in Cornwall mirroring these):

• Priority One: **Extending employment opportunities** – supporting providers to tackle the barriers to work faced by unemployed and disadvantaged people.

• Priority Two: **Developing a skilled and adaptable workforce** – supporting providers to train people who do not have basic skills and qualifications needed in the workplace.

Particularly in Priority One, ESF supports providers to tackle barriers to work faced by disadvantaged groups, including disabled people, lone parents, older workers and black and ethnic minority (BME) individuals. Thus, equal opportunities and preventing barriers to work based on discrimination and discriminative practices (such as a lack of childcare facilities) are key areas of work within ESF-funded provision. In this section the barriers to employment that an individual may face and how these can be addressed are discussed. The relationship that these barriers have to the equality agenda, and drivers of equality, such as Equal Opportunities policies and procurement processes, are then briefly discussed.

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2.1 Barriers to employment

An individual or group can face multiple barriers to employment (such as being a lone parent, from a BME community, who also has mental health difficulties).

LSC (2007) recently commissioned a review of literature on 'what works' for tackling worklessness in the UK. The LSC review drew heavily on the research by Berthoud (2003), Hasluck and Green (2007) and Ritchie *et al.* (2005) outlined below. The review identified that entering and staying in employment is especially difficult for people who are disabled, have poor health, are lone parents, members of the BME community, over 50 years of age or, have low or no level of qualifications. However, within each group different factors can be found to have a greater impact on routes into and out of employment than others. For example, people over 50 may have outdated skills for the current job market, face discrimination, and have low aspirations to work. For lone parents (who are often women) lack of childcare can be a problem. For BME groups there was a reportedly low level of skills, and they are especially affected by an 'ethnic penalty'.

The term 'penalty' is used to describe one group experiencing lower occupational or pay levels than another group, even with the same qualifications or capabilities (Heath and McMahon, 1995). Thus, there may be an ethnic or gender penalty found if women and people who are from groups are paid lower than individuals who are not, but have the same level of skills and are in similar forms of employment. Pay discrimination is a complex issue however. Not only are some groups routinely paid a lower level (for example women compared to men) but certain types of work are attached lower levels of value both financially and culturally than others. These types of employment may attract already disadvantaged groups – such as women entering low paid, part-time employment in caring professions, for example. This occupational segregation can operate as a form of 'indirect discrimination' as it reduces the parity they can have with those who predominate in higher paid professions (Tomei, 2003).

Jones *et al.* (2008) in an evaluation of the effectiveness of ESF global grants (in a previous ESF programme) also found multiple barriers to employment were key to explaining long-term unemployment among the most disadvantaged. They found that for the most disadvantaged, illness and disability and a lack of basic skills were especially prevalent. This was followed by caring responsibilities, not speaking English and being a lone parent. Drug and alcohol use and having a criminal record were also cited as barriers to employment. Having a combination of all or any of these factors thus increased the distance from the labour market an individual perceived themselves to be. Thus, groups may face discrimination in the labour market for reasons other than their identity. For example, unemployment rates amongst prisoners and those who are under supervision are extremely high (Metcalf *et al.*, 2001). Metcalf *et al.* identified four main barriers to employment former prisoners faced: poor employment 'characteristics' such as low levels of literacy or a lack of qualifications; high support needs such as drug dependency; employers' discrimination and problems revealing their criminal record when job

searching. However those who had been in prison came disproportionately from certain groups also known to suffer poor employment outcomes, such as low skilled BME communities. Therefore prisoners face a intersectionality of barriers to work.

Smith *et al.* (2006) reported on multiple barriers to employment faced by specific groups. They reported for example that people with a disability found direct discrimination, impaired individual capabilities due to lack of skills or poor health, and negative preconceptions about their ability to work, intersected to increase the barriers to employment they faced. BME groups in particular, it was reported, faced an intersectionality of living in poor housing and areas with little employment, alongside direct discrimination.

2.1.1 *Understanding multiple disadvantage*

Berthoud (2003) popularised the multiple disadvantage hypothesis – that as the number of disadvantages an individual or group have increases, so too does the likelihood that they will be out of work. In his study of multiple disadvantage and employment he found *'some working age families in Britain experience combinations of disadvantage that mean they almost certainly have no work'* (2003:1).

Characteristics he associated with non-employment included:

• family structure (being a lone parent or single for example);

• low skill levels; and,

• lack of demand for labour in the local area.

There were also factors that directly related to personal characteristics:

• age, with those over 50 having a higher risk of no employment;

• disability, with any impairment leading to higher risk of unemployment; and,

• ethnicity, with people of black, Indian, Pakistani or Bangladeshi ethnicities having higher risk of no employment than white or other ethnic groups such as Chinese.

The greater the number of risk factors the greater the risk of no employment.

Further, barriers to employment include external factors, such as employment markets, that can be subject to change and factors 'internal' to an individual that cannot be changed, such as their ethnicity or age. These factors intersect, adding weight to the likelihood of an individual being out of work. Yet as Berthoud's research indicated, not all members of a certain group experience the risk of no employment at the same level – a concentration of disadvantage, such as being older, and female and having a disability, increases the risk.

So, recent research has pointed to barriers to employment operating at individual, societal and political levels, which in practice are interlocking. For example, at

the individual level, a woman with childcare responsibilities may be unable to work if childcare provision is unavailable. At the societal level, childcare provision is affected by the amount of local funding available so that what at first glance appears as an individual barrier is actually also a societal barrier. However, even if childcare is available, the labour market may also act as an individual and societal barrier if there are few employment opportunities that match an individual's current skills. Therefore, as well as childcare, an individual woman may require support and education to ensure her skills match the local job market requirements. In addition, if this woman has both a low level of qualifications and poor health/ disability, she faces a number of additional barriers that a woman with similar caring responsibilities and similar qualifications may not face, and she may require additional support to address these barriers. Therefore, as the previous example highlighted, a highly skilled, non-disabled woman in good health may be able to enter employment relatively easily if the only barrier to employment faced is access to adequate childcare and this becomes available to her through societal and political levels of action (policy-making). However, a woman in similar circumstances, but also with low level of skills, a history of impairing poor health, or who is unable to speak English, will face additional barriers and is likely therefore to require additional support to enter employment. As can be seen barriers at the individual, societal and political levels intersect and often combine to severely restrict individuals gaining access to employment.

2.1.2   Cultural norms and practices

Discrimination is defined as 'direct' – explicitly treating an individual less favourably than another on the basis of their characteristics; or 'indirect' – practices, behaviour and institutional structures that can lead to an individual being treated less favourably or having less favourable outcomes to another due to their group characteristics, without this necessarily being explicitly intended. Both forms of discrimination can damage individual life chances and go against statutory legislation. Indirect discrimination can be more problematic to identify and remedy than direct discrimination but can have important consequences as a barrier to employment – through job searching, interview or recruitment practices, for example. Indirect discrimination may also be difficult to identify because it can be tied to implicit norms and long established practices that people do not see as discriminatory. Although blatant discrimination is now less commonplace than it once was (before the existence of equality law), most of the cases that reach employment tribunals are still of direct discrimination (Johnson and Johnstone, 2010).

Barriers to employment progression are important as a lack of progression can affect the level of pay or status parity one group has with another, even if both are in employment. Barriers to progression can be rooted in specific operational practices (such as work hours, recruitment and procurement processes) and also cultural values, norms and interactions that underpin how an institution or employer operates. For example Robert *et al.* (2008) argued that there are persistent barriers to BME groups progressing into management positions. Their research for the DWP, into progression interviews, found that disadvantage arose as a result

of specific formal practices – such as the interview process – and also due to informal practices and norms. For example, BME candidates may face accusations of 'selling out' both from their co-workers and their 'cultural' community if they progress – thus inadvertent discriminatory processes can act as barriers, and can be grounded in cultural norms and expectations.

Roberts *et al.* (2008) also argued that some groups suffer a 'linguistic penalty' that can act as a barrier to employment or progression for them compared to members of the 'mainstream' culture members which developed the interview practice. Robert *et al.* (2008) argue that ensuring more equitable outcomes for individuals from BME groups must therefore extend beyond formal attempts to tackle disadvantage, through the provision of, for example, training in interviewing skills. It also requires greater recognition of the culturally specific nature of selection processes and depends on better managing and communicating that process to all candidates, in particular candidates from BME communities.

2.1.3 *Aspirations*

In Ritchie et al's (2005) literature review of workless people and communities they noted that in communities with a high concentration of multiple deprivation and disadvantage, a 'culture' of worklessness can develop. This can in turn lead to policy measures to encourage individuals into employment being undermined by family or communal pressures (:4). They also found in the literature that workless people may have previously negative experiences of work and therefore need additional support to make a transition back into employment to overcome low job/career aspirations and expectations. Research by Jones et al, (2008) also stressed that a lack of soft skills (such as confidence and self esteem) can act a barrier to work, on an individual level, but that soft skills can be promoted via the provision of training and support services, such as life coaches.

So barriers to employment stem from the attributes and circumstances of an individual, and also the practices and processes adopted by employers within the wider societal and political context. The overarching themes of multiple deprivations and the intersection of multiple barriers to employment highlight the complexity of the issue. Characteristics such as gender, age or ethnicity, are only some of the complex issues that may act to create barriers to employment and occupational development for an individual.

2.2 Addressing barriers to employment

Having discussed the nature of barriers to employment faced by individuals the following section outlines what is known about how to assist people to overcome these barriers.

Addressing barriers to employment requires: (i) interventions that encourage and support individuals to obtain the means to overcome these barriers; and (ii) structural changes (i.e. the provision of childcare; changes in employment markets). ESF provision explicitly aims to provide services that address the barriers to employment or skills development faced by individuals in different locations. As

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demonstrated above, addressing barriers to employment will differ depending on the different, often multiple, disadvantages an individual has to overcome.

Jones *et al.* (2008) found that to address multiple and intersecting barriers to employment, flexible services that are responsive to local needs and access constraints (such as being unable to travel to the location of training) are key. Hasluck and Green (2007) argued that due to the interrelated nature of barriers to employment people face, an holistic approach needs to be taken to assist people (i.e. a range of services, advice and support being provided that address different types of difficulties or barriers operating in an individual's life in a joined up manner). The motivation of an individual customer to engage with services was also key to how successful their engagement with support to assist them find employment would be.

Hasluck and Green (2007) reviewed which interventions and type of provision appeared to work well for different client groups via Jobcentre Plus and Personal Advisers (in view of a more decentralised approach being adopted). The review highlighted how heterogeneous and diverse the needs of these groups could be.

They found that the nature of the programme and how they are delivered has a strong bearing. Different groups appear to value what they receive from a programme and how they receive support differently. Therefore a 'one size fits all' approach will not work well and different needs and aspirations of different groups should be taken into account. Hasluck and Green (2007) also found that the Personal Advisers' work practices, contact with employers, and the local context of labour markets and jobs available affect the nature and experience of accessing services to assist with entering employment. This in turn affects how successful these employment interventions will be.

In the Learning and Skills Council (LSC) review of 'what works' for tackling worklessness (2007), it was also reported that there can be no 'single' model. However, different groups have been found to have greater success in entering employment when subject to different interventions. So, for example, people over 50 could access New Deal for over 50s but there was limited evidence as to the success of this for them. Rather, their aspiration to work, the advice available, support to access job placements in new forms of employment, or advice on becoming self-employed utilising existing skills, were found to be key measures assisting older people to overcome barriers to employment.

For lone parents practical support was most useful, including financial assistance to cover the costs of entering employment and access to childcare.

People with disabilities form a complex and diverse group and their disabilities can take different forms (i.e. mental or physical, on a spectrum of need). Interventions found to be most successful included those that provided a highly individualised approach, a core contact with a supportive intermediary and work placements (that were individually tailored and supported).

For members of the BME population culturally sensitive supportive programmes of education and work placements, accessed through community outreach, worked best. Provision of advice in languages other than English or of English Language training was also found to be important.

Overall, the LSC review asserted that personalised holistic services that are community-based and can respond to local needs provide the optimum support. Learning 'pathways' to ensure that individuals have a planned progression and basic language and literacy skills are also an important means to address personal skills needs. Finally, raising the aspirations of the long-term unemployed and flexible/supportive employers are also important triggers for enabling access to employment.

2.2.1 Quality of provision

Research by Hudson *et al.* (2006) on BME people's perceptions of Jobcentre Plus found that, on a micro level, the ethnicity of individuals accessing Jobcentre Plus services did not affect their experiences. Rather, the quality of the service they received and type of provision they fell into (i.e. New Deal for Lone Parents or New Deal for Young People) had the greatest effect. There was also a general inconsistency in quality. However, it was also reported that indirect discrimination may occur due to resourcing or staffing problems. For example, staff did not seem clear how to utilise systems to investigate or address discrimination from potential employers reported by respondents. This could lead to BME individuals not being encouraged to proceed with a complaint even when an episode of discrimination may have occurred. There was also limited access to translator services or lack of ESOL (English for Speakers of Other Languages) provision due to resourcing constraints, limiting access to services for those who could not speak English well.

Therefore, Hudson *et al.* (2006) recommended that staff training and resources to ensure the needs of a diverse population are met are important for tackling the barriers to employment access or services that BME groups may face. Community outreach, employing staff from diverse backgrounds (to mirror the communities being supported) and individualised one-on-one support and advice were identified as good practice in providing services to BME groups.

2.2.2 Lessons from outside of the UK

Research commissioned by the DWP examined strategies that have been used in the United States and Europe to promote positive employment outcomes for disadvantaged groups. Rangaranjan *et al.* (2008) completed a review of US programmes aimed at promoting employment outcomes for people with disabilities, particularly those receiving cash benefits. Despite the differences in approach to disability welfare provision within the US and UK, the US experience offered a number of policy implications for the UK. The interventions that had greatest impact on employment for disabled respondents in the US tended to provide intensive services, tailored to individuals needs. These had a narrowly

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focused target group and adopted an integrated holistic approach. For example, supported employment initiatives that placed mental health and employment support together were provided for people with psychiatric conditions.

Rangaranjan *et al.* (2008) found that measures providing less intensive support to a broader population had less impact, particularly on their earnings and employment status. There was also found to be a repeated success of supported employment which combined employment and health services. Thus, the US evaluation indicated that tailoring services to needs of each respondent results in better employment outcomes – mirroring the finding of UK reviews. The US review also, however, noted that such bespoke services tend to cost more and there was not found to be an overall reduction in the number of claimants following intervention.

2.2.3   *The role of employers and organisational policies*

Employers also have a key role to play in ensuring access to employment opportunities for different groups and to assist individuals overcome specific barriers they may face. In the research by Hudson *et al.* (2006), employers were interviewed. Whilst larger organisations tended to be more likely to have formal Equal Opportunities policies and monitoring procedures than small employers, Hudson *et al.* found that this did not necessarily relate to good practice in equality work. Noon and Hoque (2004) reported a similar finding in their research of Equal Opportunities policies. They argue an 'empty shell hypothesis' – that the existence of Equal Opportunities policies and monitoring does not necessarily translate to good practice in the operation of policies and that Equal Opportunities policies, therefore, may represent an 'empty shell' with no practical value. This could be manifest, for example, in employers with developed Equal Opportunities policies having no BME staff in an area with a high BME population.

Examples of good practice by employers for recruiting and employing a diverse workforce were reported by Hudson *et al.* (2006:26). This good practice included an agency that had altered their recruitment practice after using an outside consultancy to review their existing practice. Alterations included changes to the wording of forms, monitoring the ethnicity of applicants and introducing competency-based assessment at the interview process. Recruitment practices that especially targeted BME groups were also made via links to Race Equality Councils which distributed leaflets on behalf of employing organisations. This was alongside mainstream advertising in the media and advertising on local mediums accessible to a wide range of people, such as local transport.

2.2.4   *Positive action*

Such measures as those listed above (targeting underrepresented groups alongside mainstream recruitment measures) could be described as positive action. Whilst positive discrimination (actually selecting someone on the basis of their characteristics to make up a quota) is illegal in the UK, positive action is allowed. However, in what is described as 'a bold move', the forthcoming Equality

Bill (outlined above) will allow a form of positive discrimination in a tie-break situation. Referred to as positive action measures, it would allow discrimination in favour of a candidate from an under-represented group where applicants are equally qualified (Johnson and Johnstone, 2010).

Dhami *et al.* (2006) researched examples of positive action policies in Europe and North America to ascertain learning for the UK. Positive action policies can be an important means by which to encourage employers and agencies to explicitly consider the barriers that may exist for certain groups to access employment with them and to develop strategies to overcome barriers. Whilst Dhami *et al.* were cautious in positioning such policies as the causal mechanism that would necessarily lead to greater equality, they also identified other factors that appeared to have particular significance in promoting greater workplace equality. These included 'buy in' for the principles of equal opportunity from senior management and the policy of contract compliance where the procurement process is used as a driver to encourage equality.

The US procurement process of 'contract compliance' used as a driver of equal opportunity employment, can be complex to develop and enforce as US examples in Dhami *et al.* illustrate. They outlined how federal contractors and subcontractors which have 50 or more employees and a contract of more than $50,000 have to develop an affirmative action plan within 120 days of receiving the federal contract or they may lose it and become ineligible for future contracts.

The first phase of their positive action plan is to conduct a 'utilisation' study of the firm's employees (i.e. the percentage of managers in certain departments who are black, Hispanic or white). They also have to work out the 'availability pool' – that is those in the local community who are qualified and available for this work from female or BME groups. They then have to compare the actual distribution of minorities with the available pool. If the actual is equal to or greater than the pool then the employer is 'in compliance'. If it is not, then they are defined as being 'underutilised' and must develop a goal and timetable for their plan to become compliant. This could include wider or more public advertising or referrals from local minority organisations. If it is suspected that an employer with a federal contract is not contract compliant in this way, they face a compliance review.

In the UK context there is little support for such structured positive action and the provisions within current equality law are little used even though it can be a useful tool for employers wishing to develop initiatives to address employment barriers for disadvantaged groups (Johnson and Johnstone, 2010)

2.2.5 Procurement

As the example from Dhami *et al.* (2006) in the US illustrated, the procurement process (whereby public services are provided by companies contracted to a public body) can be an important driver of equality if equal opportunity practice and policies are made a component of the contractual agreement. This can include organisations or companies not being eligible to bid for contracts if they cannot

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demonstrate a high level awareness of equality issues, and a high quality equal opportunity policy being in place within their organisation.

Once the contract had been awarded, contract management (ensuring that the agreements of the contract are met) can operate to continue to promote equal opportunities via the procurement and contract management process. For example, it may include ensuring performance or equality targets are being met. Receiving contracted funds may be dependent on this. This can act to ensure that agencies mainstream equality within their day-to-day operation and practice. In the case of ESF (as is outlined in the next section) the procurement process for funds to provide services to support those who are disadvantaged enter employment and training includes the explicit promotion of gender equality and equal opportunity policies and practices.

Thus, overcoming barriers to employment goes full circle, with the contracted organisations requiring the incorporation of good equal opportunity practice into their work, and the aim of their service being to support individuals to overcome barriers they may face in relation to personal characteristics and circumstances, in order to access employment and training.

2.3   Summary

In this section barriers to employment experienced by different groups have been identified. In particular it has been found, from existing literature, that multiple disadvantages create a cumulative effect, whereby those with intersecting forms of disadvantage are furthest from employment. The literature also recommends a local, holistic and individualised approach being taken to support individuals to progress and overcome the barriers to employment they face. Additional factors such as employers and local employment markets also influence access to employment. Certain mechanisms such as procurement and contract management can be used by public bodies to ensure that those providing support for people to overcome barriers to employment promote equal opportunity policies and practice.

This sets the context for understanding the ESF Gender Equality and Equal Opportunities Mainstreaming Plan, which is outlined in detail in the next section.

Section 3: ESF and the Gender Equality the Equal Opportunities Mainstreaming Plan

A new ESF programme was launched in 2007, operating until 2013. There are two key funding streams for ESF in the UK: Convergence objectives (to develop areas lagging behind the rest of the EU economically) and Regional Competitiveness and Employment objectives. Only Cornwall and the Isles of Scilly are part of the Convergence objectives in England. The rest of England (ten regions including Gibraltar) obtain funds regionally from the Regional Competitiveness and

Employment objectives. In addition, sub-areas within two of these regions have transitional funding for providers funded under objective 1 in the previous stream to 2006 and so have their own ring-fenced funding.

Funds for ESF providers are managed regionally by Co-financing Organisations (CFOs) with overall management of the programme being the responsibility of DWP. DWP also acts as the CFO for about a third of providers funded under the programme. The LSC is the CFO for about half of providers. The remaining providers (about one in six) have regional bodies such as the London Development Agency (LDA) or some local authorities as their CFO.

The Managing Authority of the ESF recently produced a Gender Equality and Equal Opportunities Mainstreaming Plan as part of their ESF Operational Programme, which outlined strategies, policies and monitoring and evaluation systems for ESF providers. This strategy included the Gender Equality and Equal Opportunities Mainstreaming Plan, the aim being the integration of Gender Equality and Equal Opportunities policies and practice into all aspects of policy and at all levels of ESF. In this final section of this review the Gender Equality and Equal Opportunities Mainstreaming Plan and how it integrates with existing ESF operational procedures, is outlined.

This material is adapted from the most recent ESF Gender Equality and Equal Opportunities Mainstreaming Plan Progress Report (2009).

3.1 Mainstreaming Gender Equality and Equal Opportunities within ESF

Within the Mainstreaming Plan Progress report it is stated that: Gender equality and equal opportunities mainstreaming is a social justice-led approach to policy-making in which equal opportunities principles, strategies, and practice are integrated into all aspects of the policy. The gender equality duty and other equality duties in the UK set out legal requirements for public bodies – the mainstreaming approach complements this by helping organisations to address these requirements.

The aim of the Mainstreaming Plan is to ensure that gender equality and equal opportunities will:

• be properly integrated into the planning, delivery, monitoring and evaluation of the ESF programme;

• support a dual approach to mainstreaming, i.e. one which encourages all providers to take gender equality and equal opportunities into account when delivering their activities as well as using ESF to support a range of specific or specialist support activities;

• achieve the equality targets set out in the operational programme at national and regional level and ensure that all partners including regional partners are aware of the important contribution they have to make towards mainstreaming and the achievement of equality targets;

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- maintain a sustained and proactive approach to promoting gender equality and equal opportunities and ensure that the theme is highly 'visible' throughout the programme;

- encourage all stakeholders involved in the programme to consider how they might improve upon the way they integrate equal opportunities by sharing and disseminating new ideas and good practice as well as reward those partners through a national award scheme; and

- help to ensure that all partners involved in delivering ESF actively promote equality in line with their public duties under equalities legislation.

In this plan, gender is specified as an issue along with wider equal opportunities because:

- ESF is an EU-funded programme and the structural fund regulations give specific reference to the importance of promoting gender equality in all structural fund programmes;

- women comprise 50 per cent of the population and are therefore a significant target group for programmes; and

- all public bodies have a public duty to promote gender equality.

3.2 ESF 2007-2013 programme and the equalities agenda

There are aims inherent to the 2007-2013 programme that led to the promotion of Gender Equality and Equal Opportunities having an explicit focus. These include the new programme having a focus on targeting older women and men, promoting active ageing in the labour market and providing skills training for older workers.

In the programme it is also recognised that there are disparities between ethnic sub groups in the labour market and that Pakistani and Bangladeshi groups (especially women) are particularly disadvantaged and are to be targeted.

Another key issue relates to disability. It has been found that the representation of disabled people according to the reported management information (MI) programme data has been much lower than self-declared data from the beneficiary survey. This may indicate that MI data underestimates the participation rates of disabled people in ESF provision. It has therefore been proposed that the new programme needs to actively promote disclosure of disability, in order to help beneficiaries and also to ensure that the statistical data is more accurate in this respect.

3.3 DWP and other equality schemes relevant to ESF

In the UK, overall responsibility for managing ESF funds lies with the DWP and therefore the links between the Mainstreaming Plan and other existing DWP equality schemes are important at a strategic and operational level.

The mainstreaming strategy is intended to ensure that the ESF Operational Programme in England is delivered in a way which is consistent with the existing DWP equality schemes and wider framework of equality legislation. A key aim is to ensure that the ESF programme is contributing to the DWP's public duty to promote equality. The DWP published its first disability and gender equality schemes in December 2006.

The LSC also has a Single Equality Scheme that covers all its funded provision, including that funded through ESF. It incorporates individual schemes for gender, disability and ethnicity into a coherent framework for promoting equality and diversity. The scheme describes how the LSC challenges itself, its partners and providers to deliver outcomes which are representative of the communities they serve, and how they will address disadvantage and raise the aspirations of both present and potential participants.

RDAs and local authorities that are CFOs for ESF funds have their own equality schemes. Although their ESF delivery may not be specified in their equality schemes, the mainstreaming approach proposed in the ESF Plan intends to ensure that the ESF-funded element of delivery is focused on helping discharge public duty to actively promote equality and includes providers and their subcontractors directly involved in delivering ESF.

The Mainstreaming Plan proposes that CFO plans, procurement and contract management processes are subject to Equality Impact Assessments (EIAs). EIAs provide a framework for considering potential risks to different groups and also provide the opportunity to consider how the policies and practice can further develop equality.

Continuing to develop the capacity of CFO staff in terms of their understanding of their legal duty to promote gender equality (as well as the other public duties) has also been a theme of the training that was proposed in the Mainstreaming Plan. Further, identifying and disseminating good practice in equal opportunities – including gender – is also one of the objectives of the Mainstreaming Plan.

3.4 Key partners involved in implementing Gender Equality and Equal Opportunities mainstreaming within ESF

This section highlights the key players involved in implementing Gender Equality and Equal Opportunities within the ESF programme:

Managing Authority: The Managing Authority actively promotes equal opportunities by developing the operational policy for mainstreaming equal opportunities, including integrating it into plans, delivery arrangements, monitoring systems as well as setting up an equal opportunities network and integrating the theme into communications and the national website, etc. The Managing Authority is responsible for:

• preparing and updating the Mainstreaming Plan;

• providing guidance on equal opportunities for CFOs and other beneficiaries;

- ensuring that CFOs make their providers aware of their legal obligations in terms of promoting the different equality duties and to help develop training materials and guidance which CFOs can use to help them discharge this function;

- setting up the national ESF equal opportunities award scheme which recognises providers and CFO partners who go the extra mile;

- providing the Chair and secretariat support for the Equal Opportunities Sub Committee and reporting back to the national programme monitoring committee;

- co-ordinating reporting arrangements and feeding reports on progress in mainstreaming equal opportunities into the annual implementation report that is submitted to the European Commission; and

- ensuring that equal opportunities is covered in monitoring of CFOs and other beneficiaries).

Programme Monitoring Committee (PMC): The PMC ensures that a high level of commitment and visibility is given to promoting the equality theme. It will receive update/progress reports from the Equal Opportunities Sub Committee as a regular agenda item and discuss the progress that is being made towards the equality targets for the programme as well as any other relevant equality mainstreaming issues concerned with performance or delivery.

Gender Equality and Equal Opportunities Sub Committee: The Gender Equality and Equal Opportunities Sub Committee has an important role in advising the Managing Authority on the preparation and delivery of the Mainstreaming Plan.

Regional Skills Partnerships (RSPs): The RSPs (and the London Skills and Employment Board in London) establish the regional ESF framework documents for their region which informs the CFO's plans. These CFO plans inform the tender specifications for the procurement of provider services, setting out the regional priorities for funding and support.

The Managing Authority issued specific cross-cutting theme guidance to RSPs before the programme started which emphasised that public bodies now have a general duty under equality legislation to promote equality in a proactive way. The guidance explained that equal opportunities targets would be set for each region in order to meet output and result indicators in the national operational programme. They also identify the equality issues to be addressed in the regional ESF frameworks.

Regional ESF committees: Regional ESF committees have a role to play in terms of endorsing the regional CFO plans, ensuring that equality issues identified in regional ESF frameworks are to be addressed and also in considering CFO regional performance reports, including progress towards equality targets as well as agreeing remedial action to remedy any under-performance.

Co-financing Organisations (CFOs): CFOs ensure that equal opportunities are integrated into provider procurement arrangements and set contractual obligations, etc. concerning equal opportunities in terms of policies, implementation plans and adhering to legislation. CFOs need to ensure that their plans identify the Priorities described in the regional ESF framework documents and that these, in turn, are reflected in the procurement process. They have an important role to play in terms of actively promoting equal opportunities as well as ensuring that contractual requirements are met through monitoring visits, etc.

CFOs carry out monitoring of providers to check delivery arrangements and they are also responsible for ensuring that all providers funded by ESF or match respect ESF regulatory requirements, with particular regard to cross-cutting themes – including equal opportunities.

CFOs devise three-year CFO plans which address priorities set out in the regional ESF frameworks. These CFO plans should refer to specific activities which ESF can be used to support which also help mainstreaming. The delivery arrangements may vary depending on the contracting model used. For example, in DWP the 'prime contractor' may support niche or specialist provision which is specific to certain groups being targeted or which offer a specialist service which more mainstream providers may not be able to deliver.

Providers/local delivery: ESF providers will have a vital role to play in actively promoting equal opportunities through the way they design and deliver their training to respondents. They need to deliver within the contractual requirements as a minimum.

ESF evaluation

The ESF programme is also subject to an evaluation strategy. As part of the evaluative programme for 2007-2013 Equal Opportunities policies and practices within ESF are being evaluated.

3.5 Summary

The ESF Gender Equality and Equal Opportunities Mainstreaming Plan explicitly sets out both the strategy and some of the methods that can be used to mainstream Gender Equality and Equal Opportunities within ESF. The implementation of the Mainstreaming Plan, and more generally, how drivers of Gender Equality and Equal Opportunities operate at each level of ESF are currently subject to evaluation. This evaluation also explores the barriers to employment faced by different equality groups and how these may be overcome through the promotion of good practice regarding Gender Equality and Equal Opportunities.

This review is intended as a brief accompanying document to the evaluation, setting out the context and history of Gender Equality and Equal Opportunities within ESF. However, it should be stressed that the evaluation will be based entirely on findings from qualitative research with stakeholders within ESF (CFOs, strategic managers, providers, respondents etc) and will stand alone from this review as a substantive piece of research. The literature review is not intended for publication.

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Appendix C
DWP/LSC current procurement and contract management process

DWP's equality mainstreaming arrangements for procurement and contract management

1   DWP is committed to equality and to promoting opportunity and independence for all. DWP has processes in place in its procurement and management arrangements for employment provision which aim to ensure that equality and diversity are effectively delivered. Equality requirements are an integral part of the processes for procuring provision, provider accreditation, contract management and quality assessment. Provider guidance informs providers of DWP's requirements.

2   Providers are aware that commitment to equality and valuing diversity must be demonstrated in the delivery of contracted employment provision. Discrimination is not tolerated on any grounds including gender, marital status, sexual orientation, race, colour, nationality, religion or age.

Procurement

3   All procurement is delivered under EC procurement requirements for openness and competitiveness. DWP buys a range of provision for customers with diverse needs and who face often difficult or multiple barriers to working. Any organisation which can meet the criteria for accreditation may bid – organisations not yet accredited may still bid but will be required to become accredited before contract award.

4   In the procurement process, bidders must set out their understanding of the services required by, and their experience of working with, the relevant customer group(s) as detailed in the provision specification. They are asked to provide evidence of how they have met the requirements of specific customer groups or, if the organisation has no or limited experience they must explain how they will address this gap and detail how they will support them. This may be by the inclusion of expert partners or subcontractors in the delivery of the service. Bidders must provide details about premises and facilities they intend to use, details of their suitability for the particular provision, what equipment and facilities will be available and to describe transport and accessibility arrangements. This is to ensure compliance with the DDA. Responses to these requirements are taken into account in the assessment of bids.

5   All procurement opportunities are advertised through the Supplying DWP website. Information from the 2008 DWP ESF procurement is at http://dwp.gov.uk/supplyingdwp/what_we_buy/european_social_fund.asp

Provider accreditation

6   Under the terms of the DWP contract, before a provider can be awarded a contract of more than £50,000, they must be accredited through the DWP accreditation process, which is managed on DWP's behalf by a partner organisation, Momenta. Provider accreditation includes ensuring that suppliers comply with legislative requirements, including Equality and Diversity legislation. The provider is required to ensure that any subcontractors adopt and implement similar policies and plans.

7   As part of the accreditation process the provider will be asked how they have ensured that any previous or existing provision meets the requirements of the relevant Acts, including whether they have a written Equal Opportunities Policy that adheres to the requirements of the following:

- Sex Discrimination Act 1975;
- Race Relations Act 1976 and Race Relations (Amendment) Act 2000;
- Disability Discrimination Act 1995;
- Employment Equality (Religion and Belief) Regulations 2003;
- Employment Equality (Sexual Orientation) Regulations 2003;
- Age Discrimination 2006.

8   Providers will be asked whether any findings of unlawful discrimination in relation to non-employment matters have been made against them in the last three years, or if any of their contracts have been terminated on the grounds of failure to comply with legislation prohibiting discrimination or contract conditions relating to equal opportunities. Providers will be asked to confirm that they have a complaints procedure in place and that complaints in relation to discrimination are addressed and monitored.

9   To be accredited, all providers of contracted employment services must have Equality and Diversity policies. This must include an agreed policy for dealing with harassment and grievances, and agreed plans for supplier diversity, and for equality and training. Equality plans must include a comprehensive policy statement covering race, gender, disability, age, faith/belief and sexual orientation in line with current legislation and the relevant codes of practice. Plans must describe non-discriminatory recruitment policies and procedures and confirm that publicity for vacancies will encourage applicants equally and fairly from all groups. The provider must describe steps that will be taken to ensure that their subcontractors implement a similar policy, and set out the methods to be used for monitoring and reporting on the implementation of the policy and its effectiveness. Equality plans must also show how training will be delivered to staff at all levels and how the provider will ensure that their subcontractors implement a similar training plan.

10 Providers' accreditation is reviewed annually by Momenta. Every 12 months from the beginning of the contract the provider will be required to produce information recording the proportion of its employees who are female, disabled and the ethnic background of all employees. The provider will also be required to produce information recording the proportion of its subcontractors that are small to medium sized enterprises, BME enterprises and black minority enterprises.

Contract management

11 The contract management process is risk-based and involves formal reviews at specific intervals. Equality of opportunity is a required feature of the provider's annual self-assessment report and will be discussed at the contract review.

12 Through the terms and conditions of contracts, providers will be required to ensure that they and subcontractors assist and co-operate with DWP to promote equality of opportunity actively. Providers will be expected to support and be involved in Equality Impact Assessments undertaken by the Department at various stages, beginning once preferred bidders are known and in readiness for the start of the provision.

13 At the start of the contract and where these change during the life of the contract, providers must provide details about premises and facilities they intend to use, details of suitability for the particular provision, the equipment and facilities available and transport and accessibility arrangements.

Provider guidance

14 DWP publishes guidance for providers of all programmes. Under Equal Opportunities requirements the guidance makes clear that providers are responsible for ensuring that they are fully compliant with all Equal Opportunities and Diversity legislation. The guidance states that providers are expected to ensure the provision they deliver provides equality of access to all opportunities and seeks to narrow the gap between different groups within society in the attainment of learning and job outcomes. The guidance links this requirement to the accreditation process for providers, under which their approach to equal opportunities is an important factor in the award of contracts, and contributes to informing the level and nature of contract monitoring throughout the life of a contract.

15 In the ESF section of the guidance, to which providers of both ESF and match funding contracts are directed, sets out the ESF requirements for marketing and publicity, document retention and for support to the cross-cutting themes of Gender, Equality and Equal Opportunities, Sustainable Development and Health (London region). Providers are required to ensure that subcontractors and delivery partners also meet these requirements. This includes requiring providers to:

- maintain an equality policy, training plans and supplier diversity plan;

- ensure a discrimination complaints procedure is in place;

- ensure an Equal Opportunities Policy is in place for staff and customers;

- ensure service delivery and premises used comply with the Disability Discrimination Act (DDA);

- complete an Equality Impact Assessment;

- ensure a sustainable development plan is in place, for example, to demonstrate how waste is minimised or recycled, how energy consumption is minimised, how use of transport is minimised and promoting awareness of environmental issues. A sustainability plan is required within 26 weeks of the contract starting.

Quality inspection

16 All providers of major programme provision, including match and ESF, are subject to independent inspection by OFSTED (for the ESF provision the OFSTED arrangements are likely to be introduced by early 2009).

The primary focus of inspection is the experience and expectations of respondents on provision and will include looking at the extent to which provision is inclusive and promotes equality of access to employment and skills opportunities.

DWP and Jobcentre Plus equality schemes

17 Jobcentre Plus plays a critical role in the successful delivery of contracted employment provision, including by advising, supporting and referring customers, assisting and advising employers, providing discretionary funding and Access to Work funding for disabled people, and working in partnership with providers to plan provision requirements, co-ordinate publicity activity and support providers' performance.

18 Both DWP and Jobcentre Plus have published information on their Equality Schemes, informed by consultation with customers, staff, employers, partners and other key stakeholders.

DWP Equality Schemes Progress Report
http://www.dwp.gov.uk/aboutus/equalityschemes/

Jobcentre Plus Equality Schemes
http://www.dwp.gov.uk/aboutus/equalityschemes/progress/pdfs/ES2008-English-JCP.pdf

DWP Commissioning Strategy

19 In February 2008 DWP published its Commissioning Strategy following a consultation exercise and further extensive consultation with existing and potential providers, representative groups, employer organisations, and other parts of government. The document sets out a more strategic approach to the commissioning of employment programmes. It includes measures to support medium and smaller providers, and those offering specialised services. The Code of Conduct contained in the strategy describes principles of behaviour between providers, and between providers and their subcontractors.

20 Among the core values in the Code are for providers to have respect for their partners (actual and potential), including the use of fair contracting and funding arrangements; to ensure transparency, non-discrimination, equal treatment and accountability in relationships between the parties; and to promote equality and diversity in their own workforce and in their supply chain.

21 On Equality and Diversity, the strategy states that all providers will have effective equality and diversity policies and that providers should promote diversity and equality in their ways of working, in relation to their own staff, their supply chain and in the delivery of services.

22 The strategy is not specific to a particular programme or provision and is a framework that will evolve as the market matures. DWP will develop plans and practical arrangements to start to turn the principles into new ways of working. Some of these will be implemented as new provision is commissioned, such as the flexible New Deal. Others will be developed and tested separately, including looking at how partnerships can build joined-up delivery arrangements.

DWP Commissioning Strategy

http://www.dwp.gov.uk/publications/dwp/2008/com-strategy/cs-rep-08.pdf

Learning and Skills Council's arrangements for procurement, contract management and consultation

This annex sets out how the Learning and Skills Council integrates equal opportunities into its procurement and contract management processes.

Procurement

The LSC operates a two-stage Open and Competitive Tendering (OCT) process for the selection of providers.

Stage One, the Pre Qualification Questionnaire (PQQ), has an array of questions establishing the suitability of a provider to be Invited To Tender (ITT) for specific elements of learning and skills delivery. This includes equal opportunities as well as quality, health and safety and financial health.

Stage Two, the ITT specification, against which submissions are made, contains the specific details of what provision is sought and in many cases it will specify particular delivery targets on specific respondent types such as sex, disability, age, ethnicity, employment status, prior skills level, etc. The ITT concentrates on measuring each applicant's ability to deliver the tender specification to the standard required, including breaking down the costs of delivery, management etc. However it maintains an overview on the specifics of how equal opportunities will be addressed with regard to this particular element of delivery.

Both of these stages of the OCT process contain assessment elements which measure responses on equal opportunities. Below are example files from both stages. These show not only the questions but the scores carried for each answer. The PQQ equal opportunities score is a maximum of 68 out of a total of 192, and the ITT equal opportunities/cross-cutting themes elements carry a maximum of 12 out of 149 for the full assessment.

NB where the PQQ score shows "– 68" overleaf this should read 0 as in other fields.

The Equal Opportunities scores associated with the PQQ process represent over a third of the total available score for the PQQ, and so an applicant needs to score well in this section. The minimum threshold for this whole section is 35 (of the 68) points and failure to score over this threshold would result in a failed application. In total a provider was required to score 131 of the 192 available points to be invited to enter the ITT stage. Any issues that need further details or improvements on any section of the PQQ or ITT are addressed firstly with the provider in the contract clarification part of the OCT process and later through the contract management and relationship management processes.

PQQ Questionnaire

Question	Description			
NOTE	The purpose of this section is to establish your organisation's commitment to equality of opportunity			
Question	**Description**	**Mandatory**	**Question Type**	**Max score**
[EO] Equal Opportunities: Policy	Do you have an equal opportunities policy?	No	Yes/No Value	– 68/10
[EO] Equal Opportunities: Statutory Obligations	Is it your equal opportunity policy as an employer to comply with statutory obligations under the legislation covering disability, gender, race, age, sexual orientation and religion and/or belief equality and accordingly, our practice not to treat one group less favourably than others because of their gender, disability, ethnicity, age, sexual orientation, religion and/or belief in relation to decisions to recruit, train or promote employees or learners?	No	Yes/No Value	0/7
Question	**Description**			
NOTE	Your policy on equality and diversity, covering gender, disability, ethnicity, age, sexual orientation and religion and/or belief is set out (please indicate as appropriate):			
Question	**Description**	**Mandatory**	**Question Type**	**Max score**
[EO] Equal Opportunities Policy Details: Instructions	Is your policy on equality and diversity set out: in instructions to those concerned with recruitment, training and promotion:	No	Yes/No Value	0/8
[EO] Equal Opportunities Policy Details: Documents	Is your policy on equality and diversity set out: in documents available to employees, learners, recognised trade unions or representative groups of employees or learners:	No	Yes/No Value	0/5
[EO] Equal Opportunities Policy Details: Advertisements	Is your policy on equality and diversity set out: in recruitment advertisements and other literature:	No	Yes/No Value	0/5
[EO] Equal Opportunities Policy Details: Record Keeping	Equality record keeping of workforce and learners (by ethnic origin, gender and disability) is undertaken?	No	Yes/No Value	– 68/10
[EO] Equal Opportunities Policy Details: Observing Codes of Practice	Do you observe the Codes of Practice from the Statutory Commissions for equality, which give guidance to employers on the elimination of discrimination and the promotion of equality of opportunity in employment?	No	Yes/No Value	0/8
[EO] Equal Opportunities: Formal Investigations	In the last three years has your organisation been the subject of a formal investigation by the Commission for Racial Equality (CRE) or the Equal Opportunities Commission (EOC) or the Disability Rights Commission (DRC) on the grounds of alleged unlawful discrimination?	No	Yes/No Value	0/5
[EO] Equal Opportunities: Findings Against You	In the last three years have there been any finding of unlawful discrimination made against your organisation by any court or employment tribunal?	No	Yes/No Value	0/5
[EO] Equal Opportunities: Analysis of Grievances and Complaints	Do you collect and analyse data on grievances and complaints made which include a claim of discrimination on the grounds of: gender, disability, race, age, sexual orientation and religion and/or belief?	No	Yes/No Value	0/5

Technical Questionnaire – Part 2 – Financial Standing and Insurances – Section Max Score 39

ITT Equal Opportunities Questionnaire

1 Contribution to Equality and Diversity Cross-Cutting Theme

(Max score available = 12 across all 4 questions) (Max character limit = 3,000 characters for each 4 sub questions)

15A Do you understand the wide range of needs you might have to deal with when working with the respondents? (3 points)

Tip: Describe the wide range of needs that exist within your target group(s) and demonstrate that you understand these different needs. Explain any previous experience you have of working with the different target group(s) and or/how you have conducted research or consultation exercises to find out about their different needs. Explain how you will influence employer behaviour to respond to the needs of respondents.

Ref: NW/Y/S01/C15

Please enter your answer here

15B Will the way you design and deliver your activities meet these different needs? (3 points)

Tip: Explain how the design and delivery of your proposal takes into account the wide range of needs that exist within your target group(s).

Explain how your previous experience and/or research/consultation have informed the design and delivery of the proposed activities.

Ref: NW/Y/S01/C16

Please enter your answer here

15C Does your organisation have an Equal Opportunities policy and a plan that explains how you will put this into place and monitor progress?

How will this impact on your proposed activities? (3 points)

Tip: Explain how your policy and plan will impact upon staff and respondents involved in your proposal. Describe what equal opportunities targets you will set and explain how these will be monitored and reviewed during its lifetime. If you are working with other organisations, explain how you will ensure that they are committed to equal opportunities. Explain how you will deal with any complaints of discrimination, bullying or harassment that may be made by staff, respondents or the general public. Finally, please confirm that your organisation will meet its obligations under the Disability Discrimination Act, the Race Relations (Amendment) Act, the Sex Discrimination Act, the Employment Equality Regulations for Sexual Orientation and Religion/Belief, and any other relevant legislation in the delivery of the proposed activities. It is not necessary to attach a copy of your organisation's Equal Opportunities policy.

Ref: NW/Y/S01/C17

Please enter your answer here

15D Will you use appropriate marketing and publicity for your proposed activities that reflect your organisation's commitment to equal opportunities? (3 points)

Tip: Describe the different methods and types of marketing and publicity material you will use to promote your proposed activities, with particular reference to how equal opportunities issues will be reflected in your choice of material.

Ref: NW/Y/S01/C18

Please enter your answer here

Contract management

The LSC operates an integrated management structure for all its funds to ensure an appropriate separation of duties. The LSC use contract staff that review performance, payments and contracts and are predominantly desk-based. These staff work in concert with outward-facing partnership staff that deal directly with the providers and have an holistic 'relationship' with the providers giving them a single point of contact with the LSC.

Reviewing equal opportunities issues forms part of both roles' responsibilities, from monitoring performance and Individual Learner Record (ILR) returns against contracted requirements as performed by the contracting staff, to work carried out by the partnership team as described in the LSC's single equality scheme. Action for equality and diversity and (where appropriate) equality and diversity impact measures (EDIMs) are considered as part of partnership teams' dialogue with providers on their plans, focusing on progress against the current plan, improvement indicators and specific areas for action or development. This includes responding to needs that the provider has identified, and the provider's own EDIMs.

All reporting takes place through the LSC's existing information-gathering and progress reviews. Partnership teams may seek specific information relating to regional action plans for equality and diversity. Providers are themselves responsible for complying with equalities legislation, and we seek their assurance that they comply with statutory duties as part of our dialogue with them.

Consultation

LSC/GO regions identified a number of third sector organisations with which to consult strategically through cross-sector consultation groups, on the development of ESF plans for 2007-2010. In addition, alongside other CFOs, the LSC holds regional and sub-regional workshops with third sector organisations, to support their participation in the OCT procurement process.

Appendix D

Source: http://intralink/1/corp/sites/finance/ced/products/procurement%20 reference%20manual/dwp_m192557.asp

Introduction to sustainable procurement

Equality and Diversity in procurement

E013 Most DWP commercial staff are aware of the increasing importance placed on equality issues in contracting. The Department has a legal duty to comply with equality law and a responsibility to ensure that both its contracts and suppliers do not discriminate unlawfully within the meaning of current equality legislation.

The Department's standard contract terms and conditions are consistent with the law and prohibit all unlawful discrimination. Commercial staff should ensure that the appropriate terms are included in contract documentation and that any specific equality and diversity risks present in contracts are appropriately assessed and addressed.

Whilst the Department's contracts do include standard terms and conditions which provide some assurance when incorporated in written contracts, commercial staff must not rely on inclusion of these terms alone. It is necessary to each contract that equality and diversity impacts are considered. This can be accomplished in the first instance by completion of the mandatory Sustainable Procurement Risk Assessment Methodology (SPRAM).

Each contract will require specific measures to assure that equality and diversity is addressed and where relevant to the core delivery/subject of the contract, included in contract advertisements and as evaluation criteria. Where major equality impacts are anticipated completion of an Equality Impact Assessment (EIA) should also be considered (see E015 below for further details).

E014 The role of procurement is seen as an important means to deliver and underpin equality – both in context of the UK Equality Act 2006 and DWP departmental objectives.

The Office of Government Commerce (OGC) recently released the guidance 'Make Equality Count' in consultation with DWP Commercial Directorate representatives and the Government Equalities Office. While this guidance directs that value for money is the principle function of procurement, the guide also emphasises the necessity of the provision of equality in Government contracting. Furthermore it highlights that it is possible to establish that value for money is in many cases supported by equality in contracting.

E015 OGC guidance confirms the benefits of procurement professionals conducting an Equality Impact Assessment prior to drafting adverts for contracts and defining contract requirements. A number of methods are available and general guidance can be found on the Department's Diversity and Equality Centre of Expertise intranet pages. However, the Commercial Directorate SPRAM, which is mandatory for all existing and future contracts, contains both method and guidance on approaches to removing and mitigating risk in contracting, including equality and diversity questions that are to be considered for each contract. Completion of SPRAM will provide practical guidance for commercial staff when considering the specific requirements of a contract and in most cases will provide sufficient guidance for contracts. In some contracts major equality impacts may be anticipated – in these situations an Equality Impact Assessment may also need to be completed and expert guidance may need to be sought from DWP colleagues in the Diversity and Equality Centre of Expertise.

E016 When commercial staff prepare to contract on behalf of DWP they must consider any possible impacts or needs within the contract requirement that is covered by equality legislation. This applies to all procurement processes and at each stage when letting a contract.

Currently, equality legislation makes provision for protection for the following individuals, groups of people or characteristics:

- age;
- disability;
- gender;
- proposed, commenced or completed reassignment of gender (within the meaning given by section 82(1) of the Sex Discrimination Act 1975;
- race;
- religion or belief; and
- sexual orientation.

In accordance with the UK Equality Act 2006 and related legislation, DWP must exercise its public functions with a view to encouraging and supporting the development of a society in which:

• people's ability to achieve their potential is not limited by prejudice or discrimination;

• there is respect for and protection of each individual's human rights;

• there is respect for the dignity and worth of each individual;

• each individual has an equal opportunity to participate in society; and

• there is mutual respect between groups based on understanding and valuing of diversity and on shared respect for equality and human rights.

As a central Government department, DWP must have due regard to the general duty to promote equality and diversity. The Equality Act 2006 summarises the actions necessary to the duty to promote as:

• promote understanding of the importance of equality and diversity

• encourage good practice in relation to equality and diversity

• promote equality of opportunity

• promote awareness and understanding of rights under the equality enactments

• enforce the equality enactments

• work towards the elimination of unlawful discrimination

• work towards the elimination of unlawful harassment, and

• work towards enabling members of groups to participate in society

Information provided by suppliers on active equality policies, processes, communications, resources and training present within their organisation or relating to the services to be provided to DWP should be obtained as early as possible throughout the procurement process and any DWP needs must be specified in the contract requirement.

E017 Disability – commercial staff should be aware that specific action is possible regarding equality of opportunity between disabled persons and others and the department may promote the favourable treatment of disabled persons. Staff should be aware of the specific abilities that the Department has for awarding contracts to Supported Factories and Businesses. A supported business employs disabled people as over 50 per cent of its workforce. Article 19 regulations form part of European legislation that allows organisations to reserve public contracts for supported businesses. The procurement of any goods/services can be reserved meaning that only supported businesses are invited to bid for the work. Further details can be found in the OGC guidance 'Supported Factories and Businesses'.

Further background information on Equality

E018 Discrimination law protects people from discrimination in broad areas of activity including the supply of goods, facilities and services and the exercise of public functions. The term 'goods, facilities and services' covers a very wide range of activities provided to the public, or a section of the public, by private, public and voluntary sector organisations. It does not matter whether someone is asked to pay for the service or not.

Public functions provisions are more recent additions to the non-discrimination legislation. They were introduced in the wake of the Stephen Lawrence inquiry to ensure that all activities of public authorities, not simply those that were considered to involve the provision of facilities and services, were subject to the prohibition on discrimination.

The current domestic legislative framework comprises a number of separate pieces of legislation enacted over the past 40 years. The first legislative measures to protect people against discrimination in Great Britain were the Race Relations Acts of 1965 and 1968. These were followed in 1970 by the Equal Pay Act, the purpose of which was to ensure equal pay between men and women. The main subsequent statutes (amended as appropriate) are the:

• Sex Discrimination Act 1975 which prohibits discrimination and harassment on grounds of a person's sex in the workplace (i.e. recruitment, promotion, conditions of service) and during vocational training. The Act also prohibits discrimination on the ground of sex in the context of education and where a person wishes to have access to goods or services or use facilities, in relation to premises or in the exercise of public functions. It also contains a duty on public authorities to eliminate unlawful discrimination and harassment and to promote equality of opportunity between men and women. This 'gender' duty came into effect in April 2007. The Sex Discrimination Act also protects people on the grounds of gender reassignment in employment and from April 2008 in goods, services, facilities and premises;

• Race Relations Act 1976 which prohibits discrimination and harassment on grounds of race in the workplace and in the same areas as the Sex Discrimination Act outside the workplace. It also contains a duty on public authorities to promote equality of opportunity and good relations between people of different racial groups. This 'race duty' came into effect in 2001;

• Disability Discrimination Act 1995 which prohibits discrimination against disabled people. It differs in some important ways from the previous discrimination legislation; for example it only protects disabled people whereas sex and race legislation protect everyone, whatever their gender or race characteristics. It also goes further by requiring employers, service providers or owners of facilities to make 'reasonable adjustments' such as wheelchair ramps so that disabled people can have access to the workplace, services or facilities. It also contains a duty on public authorities to promote equality of opportunity for disabled people. This 'disability' duty came into effect in December 2006;

- Employment Equality (Religion or Belief) Regulations 2003 which protect people from discrimination and harassment on grounds of religion or belief (which includes the lack of any particular religion or belief) in the workplace and in vocational training;

- Employment Equality (Sexual Orientation) Regulations 2003 which protect people from discrimination and harassment on grounds of sexual orientation in the workplace and in vocational training;

- Employment Equality (Age) Regulations 2006 protects people against discrimination on grounds of age, in the workplace and in vocational training; and

- Equality Act (Sexual Orientation) Regulations 2007 which prohibits discrimination on grounds of sexual orientation in relation to education and access to goods, services or facilities or in relation to premises and the exercise of public functions.

The Equality Act 2006 set up the Equality and Human Rights Commission combining the functions of the then three existing equality commissions – the Equal Opportunities Commission, the Commission for Racial Equality and the Disability Rights Commission – and taking on responsibility for the other aspects of equality: age, sexual orientation and religion or belief, as well as human rights.

The main pieces of European legislation are the:

- Equal Pay Directive 1975 which underpins the principle of equal pay between men and women;

- Equal Treatment Directive 1976 (as amended by the Equal Treatment Amendment Directive 2002) which protects against discrimination on the grounds of sex;

- Race Directive 2000 which protects against discrimination on racial grounds;

- Framework Directive 2000 which protects against discrimination in the workplace on grounds of sexual orientation, religion or belief, age and disability;

- Gender Directive 2004 which prohibits discrimination on grounds of sex in the access to and supply of goods and services. Also covers gender reassignment and makes specific provision in relation to pregnancy and maternity;

- Recast Directive which simplifies and updates Community Law in relation to gender equality by amalgamating four predecessor Directives into a single one. The Directive came into force in August 2006. Implementation in the UK was notified to the European Commission in November 2008.

Appendix E
Topic guides

Gender Equality and Equal Opportunities within the European Social Fund

Strategic stakeholders

Scoping Interviews

Introduction to the topic guide

*Interviewees are encouraged to discuss their views, perception and attitudes in an open way without excluding issues which may be of importance to the research. Therefore the questioning **is responsive to the issues raised in the course of each interview, with a focus on what is relevant to individual interviewees** and their experiences.*

The following guide lists the key themes and sub-themes to be explored. It does not include questions like 'why', 'when', 'how', as the respondent's contributions will be fully explored using language appropriate to them.

This guide is designed to be used with strategic stakeholders such as members of the Gender Equality and Equal Opportunities Sub-Committee and ESF Managing Authority.

Text in italics denotes instructions to interviewer.

Interview aims and objectives: To facilitate an understanding of the interviewees' roles, responsibility, aspirations and views regarding the implementation of the mainstreaming plan, progress made and methods used to operationalise.

The overall aim of the research is to:

1. Examine progress towards implementing the Managing Authority Mainstreaming Action (see annex 1) as set out in the Implementation Plan

2. Examine Gender Equality and Equal Opportunities policies and processes at different level of ESF involvement with particular focus on procurement, contract compliance and training

3. Gather opinion on the effectiveness of Gender Equality and Equal Opportunities policies and processes with particular focus on the qualitative difference the mainstreaming plan may have introduced

4. Identify good practice

Exploring: principles; systems; and tools and techniques underpinning mainstreaming provides the structure for the discussion.

1. Introduction

Aim: to introduce the research, outline the interview and ensure consent to participate

- Introduce self and NatCen.

- Introduce the study: Commissioned by DWP/ESF Evaluation Team to undertake research on gender equality and equal opportunity policies and practice operating within ESF and progress towards the implementation of the ESF Gender Equality and Equal Opportunities Mainstreaming Action Plan.

- Ensure respondent received letter/email outlining details of study

- Details about participation:

  – voluntary nature of participation

  – digital audio recording of interview

  – to whom, and how, findings will be reported

  – request to list job title in reporting

  – length of interview – up to 1.5 hours

  – any questions respondent has at this stage about the research

  – confirm term they wish to use to discuss 'learners' – for example, respondents, learners, stakeholders. Use this term throughout.

Turn recorder on

2. Background

Aim: To explore respondent's professional role, background, relationship to ESF provision and role within the Mainstreaming Plan.

Respondent background:

This section should be probed fully and is a key contextual element of the interview. Ask the respondent to describe:

• Roles and responsibilities within their organisation

• Roles and responsibilities relating to ESF, if different

• Roles and responsibilities relating to Equal Opportunities or Gender Equality

– Within their organisation

– Within the ESF Mainstreaming Plan/Sub Committees

• Route into current role and previous personal experience

Organisational context: *For interviewees from external agencies i.e. LSC Confirm the following*:

• Organisation

– Aims and objectives

– Field of activity

– Geographical distribution of work

– Funding base

3. Gender Equality and Equal Opportunities

*Aim: to explore perceptions of Gender Equality and Equal Opportunities, to provide context to the research discussion from the **interviewees perspective**.*

• Aim and importance of Gender Equality and Equal Opportunities policies

Prompts:

– Equality of opportunity

– Equality of outcome

– Equality of treatment

– Diversity management v. equality

– Business case

– Social justice

- Barriers to employment faced in relation to Equal Opportunities

  In relation to:
  – Disability/health
  – Women/men
  – Age related
  – Ethnicity
  – Other – multiple disadvantage, stigma

- Particular areas of concern/least progress

Explore as one of Mainstreaming Plan areas for development

- Accessibility for disabled people
  - In relation to overall participation
  - In relation to flexibility/accessibility of actual services
  – Current level
  – Challenges

- Any suggested examples of how barriers can be overcome via implementation of policy/practice (potential good practice)

4. Gender Equality and Equal Opportunities policies, practice and mainstreaming – General

Aim: to explore the interviewees' views on the ESF Mainstreaming Action Plan and understanding of the concept

- Awareness of ESF Mainstreaming Action Plan
  – Own role within
  – Understanding of structure (annex 1)
  – Understanding of aims/implementation (annex 1)
  – Progress being made
  – Areas of concern/least progress
  – Areas most progress
  – Challenges/successes
  – Useful to evaluate
  – EU agreements (UK in comparison to other EU members)

- Regional committees
  - Role/awareness of
  - Progress/regional difference
- Perception of 'mainstreaming'
  - Meaning
  - Value
- The interviewees' organisations Gender Equality and Equal Opportunities policies (if external to ESF)
  - Implementation
  - Practice
  - Outcomes (i.e. balanced participation/monitoring)
  - Any effect of mainstreaming plan on their organisation practice
    - Real/bureaucratic change

5. Principles

Aim: to explore barriers, challenges and facilitators of the principles of Gender Equality and Equal Opportunities mainstreaming within ESF.

Note: Interviewees may not have knowledge of CFOs/providers or learners – listed as potential areas of discussion only.

- Identify key principles underpinning Gender Equality and Equal Opportunities Mainstreaming Plan and its implementation

May include:

Commitment levels

- Significance/evidence of commitment
  - *within governance structure/as cross-cutting theme*
  - from CFOs
  - from providers/subcontractors
  - resourcing
- Balanced participation
  - *within governance of mainstreaming plan*
  - *within CFOs*
  - *within providers/subcontractors*
  - *within learners*

Visibility

• Level of visibility

  – *within governance structure of ESF*

  – *from CFOs*

  – *from providers/subcontractors*

  – *to learners*

Cross-cutting and promotion from within

As relevant from the perspective of strategic stakeholders:

• Extent to which Gender Equality and Equal Opportunities 'cross cuts' within ESF provision

  – Policies

  – Implementation

  – Practice

  – Outcomes

• Significance and visibility of cross-cutting themes (sustainability/Gender Equality and Equal Opportunities)

6. Systems

Aim: to explore explicitly the systems that underpin the mainstreaming of Gender Equality and Equal Opportunities within ESF;

Make distinction regarding which level of ESF this is especially significant to (CFO DWP/LSC, Non CFO, Regional CFO, Providers) during discussion:

Relevant EU and UK Legislation

• Awareness/significance to ESF mainstreaming plan

  – Any challenges with compliance to legislation

  – Equality Act 2010

Implementation of policies/practice

• How best to implement mainstreaming plan **operationally**

  Discussion may include:

  – *Commitment to principles*

  – *Staff 'buy in'*

  – *Procurement*

  – *Training (of whom?)*

- *Contract compliance*

- *Challenges*

- *Successful implementation – good practice*

Procurement and contract management

Explore only if aware of process – ascertain general views on procurement and role this plays within mainstreaming plan:

• Summarise views on CFO procurement process

• Awareness of any differences between CFOs

Contracting

• Content of contract

• Way ensure contractor is valid before submission

  – For DWP must be accredited org before bid

  – For LSC use a PPQ then ITT

  – For regional CFO explore own method

• Criteria for award of contract – what to look for to award contract

Ensuring compliance

• Monitoring

• Sanctions

• Success/challenges

• Is compliance enforced (do they believe)

Procurement and Gender Equality/Equal Opportunities:

• Means to achieve specific outcomes

• Outcomes aimed for

• Outcomes achieved

• Views on procurement as a means to promote Equal Opportunities and Gender Equality

• **Anticipated effect of Equality Act 2010 on procurement process**

Monitoring

Can have different meanings, here refers to ESF:

• Awareness of systems in place in relation to ESF provision

• Monitoring in relation to Gender Equality and Equal Opportunities

• Targets

- Specific groups/outcomes

- Regularity of reviewing

- Reporting

- Outcomes

- Response to outcomes/monitoring

- Progress being made – evidenced from monitoring data?

- Improvements that could be made to monitoring system

Evaluation

- Systems for

- What should be evaluated?

- Cohort Survey

- This evaluation

7. Tools and techniques

Aim: to explore the tools and techniques that may be used to promote Gender Equality and Equal Opportunities of relevance to mainstreaming plan within ESF;

- Ask for examples of tools and techniques that are used

Examples of tools or techniques to discuss, developing from previous section on systems to avoid repetition:

Make distinction regarding which level of ESF this is especially significant to (CFO DWP/LSC, Non CFO, Regional CFO, Providers)

Equality Impact Assessments (EIA)

- Have they completed

- What were the results/focus of?

- Value

- Process undertaken to complete EIA

- Views on how process could be streamlined

Procurement process

- Significance as a tool as opposed to system

- Current system operation

Training and education

Discuss in depth:

• Opinion on existing material/provision

• For whom?

• Resources

• Relevance

• Awareness/involvement/views of **Toolkit/ECOTEC series**

• Use of **Equal Programme** to promote and support Gender Equality and Equal Opportunities

Dual approach – *funding specific activities targeting specialist provision and ensuring accessibility into programme as a whole*

• Awareness of/meaning to them

• Methods to operationalise

  – *Link into partner agencies*

  – *Refer to specialist*

  – *Provide for learners*

• Any tensions

• Effectiveness

• Flexibility of provision to address different needs *(i.e. what do they imagine happens if someone with specialist needs is referred to a project they contract manage – how is this addressed, is specialist provision offered)*

8. Final comments and future aspirations/recommendations

*Aim: to summarise interviewees future aspirations, priorities and **progress** towards mainstreaming of Gender Equality and Equal Opportunities within ESF; to summarise views regarding good practice identified;*

• Progress towards mainstreaming/challenges

  – Challenges for whom

  – Areas that require further focus

  – Areas of success (see annex 1 for prompts)

  – Measures of progress

- Aspirations/added value of Gender Equality and Equal Opportunities ESF Mainstreaming Plan

  For:

  – *Strategic planning*

  – *Governance*

  – *CFOs*

  – *Providers/subcontractors*

  – *Learners*

  – *To remove barriers to employment*

- What could/should be done differently regarding principles/systems/techniques encouraged?

- What is the main driver of mainstreaming within ESF provision?

- Summarise specific examples of good practice identified

- Anything else to add

Thank interviewees for their time and thoughts.

Distribute contact details should they wish to add anything about their comments or discuss the research further

Reiterate that job description may be listed in reporting

Summary Topic Guide

Explore:

- interviewees professional role, background, capacity and relationship to ESF provision;

- perceptions of Gender Equality and Equal Opportunities and what mainstreaming means;

- identified barriers to employment (for different groups) generated through a lack of Gender Equality or Equal Opportunities, and how these can be overcome through operational provision;

- their organisations implementation of Gender Equality and Equal Opportunities polices and practice;

- awareness and significance of ESF Managing Authority Mainstreaming Action;

- barriers, challenges and facilitators of Gender Equality and Equal Opportunities mainstreaming (with particular focus on levels of commitment, balanced participation, and ensuring this is a visible theme);

- monitoring, targets and impact assessments in place regarding Gender Equality and Equal Opportunities – within their organisation and in relation to ESF provision;

- procurement and training needs regarding mainstreaming of Gender Equality and Equal Opportunities;

- suggested and identifiable good practice;

- future aspirations, priorities and progress towards mainstreaming of Gender Equality and Equal Opportunities within employment/training provision and their own organisation.

Annex 1: Summary of Mainstreaming Plan from Operational Programme

Having reviewed the Implementation plan of the Operational Programme, the following key aspects of Gender Equality and Equal Opps (Equal Opportunities) Mainstreaming within the ESF programme 2007-2013 have been identified and summarised thus:

- Cross-cutting theme

- Comply with relevant EU and UK legislation

- Partners associated with programme also expected to comply with legislation

- Particular focus on accessibility for disabled people

- Dual approach will be adopted – funding specific activities targeting women and the disadvantaged, alongside integration of Equal Opportunities into programme as a whole

- One officer of the Managing Authority (MA) has specific responsibility for developing mainstreaming

- MA, Programme monitoring committee (PMC) and regional committees will review Gender Equality and Equal Opportunities regularly

- Managing Authority will use TA to support training in Gender Equality and Equal Opportunities

- New Equal Opportunities Sub Committee of the PMC has been established. Chaired by MA.

  - Responsible for developing mainstreaming plan

  - Implementation of plan

  - Monitoring of plan

- Regional committees report to the Sub Committee and MA on:
  - Progress towards targets
  - Examples of good practice
  - Accessibility for disabled people
- Sub Committee will disseminate learning
- MA and Sub Committee will review existing arrangements
- Use outcomes of Equal Programme to promote and support Gender Equality and Equal Opportunities. http://www.equal-works.com/Theme.aspx?ety=fd6d6132-6fe9-468a-acf6-878bb24cc074
- Promote equality from within the programme, including MA promoting a gender balance on PMC and regional committees.

Annex 2: Current relevant UK and EU Gender Equality and Equal Opportunities Legislation

UK Acts and regulations

Disability Discrimination Act 1995

Disability Discrimination Act 2005

Employment Equality (Age) Regulations 2006

Employment Equality (Religion or Belief) Regulations 2003

Employment Equality (Sexual Orientation) Regulations 2003

Equality Act 2006

Equal Pay Act 1970

Human Rights Act 1998

Race Relations Act 1976

Sex Discrimination Act 1975

Special Educational Needs and Disability Act 2001

2008 – Equality Act 2010. Due to come into force autumn 2010 as the Single Equality Act.

Human rights conventions and directives

Convention for the Protection of Human Rights and Fundamental Freedoms as amended by Protocol No. 11

Council Directive 2000/78/EC of 27 November 2000 establishing a general framework for equal treatment in employment and occupation

EU Key pieces of legislation

Equal Pay Directive – 1975

Equal Treatment Directive – 1976

Social Security Directive – 1979

Occupational Social Security Directive – 1986

Self-employment Directive – 1986

Pregnant Workers Directive – 1992

Parental Leave Directive – 1996

Burden of Proof Directive – 1997

Equal Treatment in Employment Directive – 2002

Goods and Services Directive – 2004

Recast Directive Equal Treatment in Employment and Occupation – 2006

EU Article 13 Equal Treatment Directive

Gender Equality and Equal Opportunities within the
European Social Fund

Project Staff

Case Study Interview

Introduction to the topic guide

*Interviewees are encouraged to discuss their views, perception and attitudes in an open way without excluding issues which may be of importance to the research. Therefore the questioning **is responsive to the issues raised in the course of each interview, with a focus on what is relevant to individual interviewees** and their projects and role.*

The following guide lists the key themes and sub-themes to be explored. It does not include many follow up questions like 'why', 'when', 'how', as the respondent's contributions will be fully explored using language appropriate to them and probes used as required.

This guide is designed to be used with members of staff from provider and subcontractor projects selected as a case study, examining the operationalisation of their Gender Equality and Equal Opportunities policies, practice and progress towards mainstreaming.

Text in italics denotes instructions and prompts to interviewer.

Interview aims and objectives: To facilitate an understanding of the project, and the operationalisation of the ESF Gender Equality and Equal Opportunities mainstreaming plan; identify the key mechanisms of this implementation and progress made.

The overall **aim of the research** is to:

1. Examine progress towards implementing the Managing Authority Mainstreaming Action (see annex 1) as set out in the Implementation Plan

2. Examine Gender Equality and Equal Opportunities policies and processes at different level of ESF involvement with particular focus on procurement, contract compliance and training

3. Gather opinion on the effectiveness of Gender Equality and Equal Opportunities policies and processes with particular focus the qualitative difference the mainstreaming plan may have introduced

4. Identify good practice

Exploring principles; systems; and tools and techniques provides the structure for the discussion.

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1. Introduction

Aim: to introduce the research, outline the interview and ensure consent to participate

- Introduce **self and NatCen**.

- **Introduce the study**: Commissioned by **DWP/ESF Evaluation Team** to undertake research on gender equality and equal opportunity policies and practice operating within ESF at every level, and progress towards 'mainstreaming' Gender Equality and Equal Opportunities within provision funded by the ESF.

- Ensure respondent received letter/email outlining details of study – case study of their project. **Interviewee will not be named and interview is anonymised. However the project work may be described in the reporting (although not named).**

- Details about participation:
  – **voluntary** nature of participation
  – **digital audio recording** of interview
  – **to whom**, and **how**, findings will be reported
  – length of interview – up to 1 hour
  – **any questions respondent has** at this stage about the research
  – confirm **term they wish to use to discuss 'learners'** – for example, respondents, learners, stakeholders. Use this term throughout.

Turn recorder on

2. Background

Aim: To explore respondent's background, project activities, learners served and ESF specific activities

This section should be probed fully and is a key contextual element of the interview. Ask the respondent to describe their:

Project information

Confirm the following if required:

- Organisation/project name
  – Aims and objectives
  – Field of activity
  – Geographical distribution of work
  – Funding sources

If relevant to staff member (i.e. operational staff be unable to answer):

• Managing ESF funds within their organisation

Ask to describe:

– Activities funded

– Structure/process of fund management

– Duration of funding

– Contract Management

– Procurement

– Geographical reach

– Scope/range of provision

Roles and responsibilities

• Roles and responsibilities within their organisation

• Route into current role and previous experience (if time)

• Roles and responsibilities specifically relating to ESF-funded activities, if different

• Roles and responsibilities relating to Equal Opportunities or Gender Equality, if any

– Within their organisation

– In relation to 'mainstreaming'

• Whether/how promotion of Gender Equality and Equal Opportunities are integrated into their work?

3. Gender Equality and Equal Opportunities

*Aim: to explore perceptions of Gender Equality and Equal Opportunities, to provide context to the research discussion from the **interviewees perspective**; Explore accessibility and impact of ESF provision.*

Barriers to employment

• Key barriers to employment faced by their learners

• Due to for example

• Local employment market

• Skills level

• Aspirations

• Multiple disadvantage

• Carers

- Other

- Which forms of inequality do they address within the project?

- Specific to equality strands
  - Age
  - Gender
  - Ethnicity
  - Disability
  - Other forms of discrimination

- Particular areas of concern/least progress among groups worked with
  - Disability accessibility – any particular issues to address
    - Flexibility to adapt to different needs/disability
    - Partner agencies/referrals used too

- Means to overcome barriers

  In relation to:
  - their service (outcomes, service provided)
  - individual needs (skills, etc)
  - local area (job market, etc)

- Specific focus on certain groups or mainstream (dual approach)
  - Specific community they serve – sub groups targeted (i.e. certain ethnic groups)

- Outcomes of their service for learners in addressing barriers identified

  In relation to:
  - local employment market
  - skills level
  - aspirations
  - multiple disadvantage
  - carers
  - other

- Specific to equality strands

  – Age

  – Gender

  – Ethnicity

  – Disability

  – Other forms of discrimination

- **Identification of example of good practice**

Work with employers and other stakeholders

Extent to which they:

- Engage with local employers or other stakeholders

- Use placements/mentoring

- Example of successes/challenges

- Employers reaction to different groups

- Employer related barriers – how overcome

  Examples of good practice overcoming barriers

Processes designed to promote Equal Opportunities

- Their organisation/projects Gender Equality and Equal Opportunities process

  – Staff responsible for Gender Equality and Equal Opportunities

  – Policies

  – Aims and objectives of the project

  – Monitoring (of what)

  – Implementation plans

  – Practices

4. ESF Gender Equality and Equal Opportunities Mainstreaming Plan (cross-cutting theme)

Aim: to explore the interviewees' views on the ESF mainstreaming and understanding of the concept. They may not have any awareness of it, this section is merely to ascertain if they do.

Operational staff may not have an awareness of the details of the mainstreaming plan and implementation plan, however this section should be used to discuss with them how their Gender Equality and Equal Opportunities policies and practice are operationalised, in line with contractual agreements.

*This **may be of relevance to strategic staff only***:

Awareness of Gender Equality and Equal Opportunities 'Mainstreaming'

- Awareness of ESF Gender Equality and Equal Opportunities mainstreaming or the concept of equal opportunities as a cross-cutting theme, if any:
  - Where heard about from (CFO, project manager, Ezine, website?)
  - Understanding of aims/implementation
- Perception of 'mainstreaming' Gender Equality and Equal Opportunities in general
  - Meaning
  - Value
  - Relevant legislation (e.g. public duties to promote equality)
  - Need to promote Gender Equality and Equal Opportunities, contract compliance
- Awareness of additional cross-cutting theme – sustainability

5. Principles systems and tools underpinning Gender Equality and Equal Opportunities mainstreaming

Aim: to explore barriers, challenges and facilitators of the principles of Gender Equality and Equal Opportunities mainstreaming from their perspective.

Note: Interviewees are expected only to be able to comment on their own projects and how Gender Equality and Equal Opportunities can be mainstreamed within them. The intention is to explore this to provide guidance for other projects/ subcontractors and assess progress that has been made mainstreaming.

This may only be of relevance with strategic staff – question as appropriate from this section.

Operationalisation

- Methods to operationalise/promote mainstreaming of Gender Equality and Equal Opportunities within their project

  Discussion may include:
  - *Commitment to principles*
  - *Staff 'buy in'*
  - *Procurement/way in which the project is set up*
  - *Training (for whom?)*
  - *Contract compliance*
  - *Challenges*
  - *Successful implementation – good practice*

Relevant EU and UK legislation

• Perceived significance to the work of their project/s

• Awareness/significance to their project

   – *Any challenges with compliance to legislation*

   – *Equality Act 2010*

Procurement and contract management

The procurement/contract management process should already have been explored in section 3. This section is to focus on Gender Equality and Equal Opportunities in relation to procurement.

Contracting

• Content of contract relating to Gender Equality and Equal Opportunities

Ensuring contract compliance

• Monitoring

• Sanctions

• Success/challenges

Procurement and Gender Equality/Equal Opportunities:

• Means to achieve specific outcomes

• Outcomes aimed for

• Outcomes achieved

• Views on their procurement as a means to promote Gender Equality and Equal Opportunities

Adhering to contracts

• Means by which they ensure they are contract compliant

Monitoring

• What do they monitor and why for ESF – performance/equality

• ESF targets

   – Specific groups/outcomes

   – Reporting

   – Current outcomes

   – Response to monitoring (i.e. do outcomes affect systems/practices)

   – Views on monitoring as a way to promote Gender Equality and Equal Opportunities

- Examples of good practice
- Improvements that could be made to monitoring system

Dual approach

- Provide specialist/mainstream provision
  - Value of dual approach (may need to explain meaning)
  - Any tensions
  - Effectiveness

6. Training, education and resources

Aim: to explore the range or training and resources that are and could be used to promote Gender Equality and Equal Opportunities and effective dissemination methods.

- Have they attended training on Gender Equality and Equal Opportunities
  - Type of training
  - Value
  - Other sources of knowledge re Gender Equality and Equal Opportunities
  - Remaining training needs
- Use of **Equal Programme** to promote and support Gender Equality and Equal Opportunities
- ESF website equality page (used/aware of)
- ESF good practice guides (used/aware of)
  - Opinion on existing material/provision
  - Accessed by whom
  - Relevance
  - Improvements that could be made/means to promote

Training for learners

- Incorporate Gender Equality and Equal Opportunities dimension/focus
- Outcomes

Practice dissemination

o Effective means to disseminate good practice

o Where do they access info

o Sharing of good practice with other ESF projects

o Networking opportunities

o Tensions or competition between providers (i.e. would they actively disseminate their practice or protect it from competitors)

7. Final comments and future aspirations/recommendations

*Aim: to summarise interviewees aspirations, priorities and **progress** towards mainstreaming of Gender Equality and Equal Opportunities; to summarise good practice identified.*

• Progress towards mainstreaming Gender Equality and Equal Opportunities

– Challenges

– Areas that require further focus

– Areas of success

– Measures of progress

• Could/should be done differently regarding promotion of Gender Equality and Equal Opportunities (principles/systems/techniques used)

• Summarise specific examples of good practice identified

– In tackling barriers to employment

– In the way the project promotes Gender Equality and Equal Opportunities

• Additional comments

Thank interviewees for their time and thoughts.

Distribute contact details should they wish to add anything about their comments or discuss the research further.

Discuss ongoing involvement if relevant (i.e. are learners being interviewed/ external stakeholders).

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The focus of the Gender and Equal Opportunities within the European Social Fund (ESF) research is on equal opportunities as a cross-cutting theme, looking at how equal opportunities are integrated into all aspects of the programme. The study aims to examine the effectiveness of equal opportunities policy and practice within ESF, in the context of helping to tackle the barriers experienced by each of the equality groups including examining organisational policies within projects as they relate to equal opportunities and the mainstreaming of equal opportunities, drawing upon research on participation and outcomes of different equality groups and examining the factors affecting participation, including discrimination and making recommendations for good practice to encourage equal opportunities on ESF projects.

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www.esf.gov.uk